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10  
11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13

14 MATTHEW WEINBERG,  
15 RABBI DOVID GUREVICH,  
16 NIR HOFTMAN,  
17 ELI TSIVES,

18 *Plaintiffs,*

19 v.

20 NATIONAL STUDENTS  
21 FOR JUSTICE IN PALESTINE,  
22 JOHN DOE #1, PRESIDENT OF THE  
23 UCLA CHAPTER OF SJP,  
24 AJP EDUCATIONAL FOUNDATION,  
25 INC., D/B/A AMERICAN MUSLIMS FOR  
26 PALESTINE,  
27 OSAMA ABURSHAID,  
28 HATEM AL-BAZIAN,  
FACULTY FOR JUSTICE IN  
PALESTINE NETWORK,  
UC DIVEST COALITION,  
WESPAC FOUNDATION,  
PEOPLE'S CITY COUNCIL,

*Defendants.*

**Case No. 2:25-cv-03714**

**FIRST AMENDED  
COMPLAINT FOR  
DAMAGES AND JURY  
TRIAL DEMAND**

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## NATURE OF THE ACTION

1  
2 1. After the horrific terror attack on October 7, 2023, America was  
3 plunged into a campus antisemitism crisis. *E.g.*, Staff of H. Comm. on  
4 Educ. and the Workforce, 118th Cong., *Antisemitism on College Campuses*  
5 *Exposed*, 1 (Comm. Print 2024), perma.cc/6Y4U-52HG.

6 2. This case is about a particularly shocking chapter of that  
7 crisis—a coordinated campaign of egregious acts of racial exclusion,  
8 intimidation, and assault (often styled as the “Popular University for  
9 Gaza”<sup>1</sup> or the “student intifada”) conducted by a web of organizations and  
10 individuals working in concert to intimidate Jewish students, faculty, and  
11 staff, and to hinder the efforts of law enforcement officials charged with  
12 protecting them.

13 3. The radicals behind this nationwide campaign formulated and  
14 executed a comprehensive plan to prevent Jewish communities on college  
15 campuses from enjoying equal access to public spaces using racialized  
16 violence and area-denial tactics. When law enforcement tried to restore  
17 order and ensure the protection of equal rights for Jews, the same radicals  
18 made clear that they were more than willing to fight to maintain the  
19 ground that they had lawlessly “occupied.”

20 4. The calling card of the campaign is the campus encampment or  
21 “occupied zone.” However you phrase it, the basic concept is the same—a  
22 fortified camp organized by a core of virulently antisemitic radicals  
23 associated with Defendant National Students for Justice in Palestine,<sup>2</sup>  
24 working together with a collection of equally radical faculty and union  
25

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26 <sup>1</sup> For more information on the “Popular University for Gaza,” *see*  
27 *infra*, ¶¶60-66.

28 <sup>2</sup> Also referred to as “SJP National,” “NSJP,” or simply “SJP”  
throughout this complaint.

1 groups, nonprofits willing to provide funding and administrative support,  
2 and all manner of “militant organizer[s]” and “outside agitators,” including  
3 leftist and anarchist paramilitary groups. *See e.g., Advancing the Line,*  
4 *Emboldening the People: Reflections on the One-Year Anniversary of the*  
5 *UCLA Palestine Solidarity Encampment*, Unity of Fields (May 1, 2025),  
6 [perma.cc/J5S3-V9QB](https://perma.cc/J5S3-V9QB) (*Advancing the Line*) (discussing the militant nature  
7 of the UCLA encampment, its organizers, and its rank-and-file members).  
8 There is often significant overlap in the various groups’ leadership cadres.

9       5. After the radical core congeals on a college campus, it leverages  
10 various sources of funding and material support to construct and supply  
11 an encampment; recruits volunteers to join and “defend” the encampment  
12 from “Zionists” (deployed as a racist dog whistle); and provides new  
13 recruits with the equipment, training, and direction necessary to exert  
14 physical control over the “occupied” public space on which the encampment  
15 rests. Throughout, organizers foster “militancy,” preparing for and often  
16 encouraging violent clashes with law enforcement.

17       6. This plan often entails aggressively expanding the  
18 encampment’s perimeter to maximize disruption, intimidation in the  
19 Jewish community, and the prospect of an eventual violent confrontation  
20 with law enforcement. *See, e.g., id.* at 6 (UCLA encampment organizer  
21 explaining that expanding the barricades was intended to “escalate the  
22 disruptive effect of the encampment” by rendering several university  
23 buildings “non-functional for public use”).

24       7. The result is that wherever such an encampment appears, a  
25 growing Jew exclusion zone enforced by threats, intimidation, and violence  
26 is not far behind. *See, e.g., Frankel v. Regents of the Univ. of Cal.*, 744 F.  
27 Supp. 3d 1015, 1020, 1025 (C.D. Cal. 2024). “The purpose” of these  
28



1 encampments is “to cost the university money, to physically disrupt, and  
2 to express mass oppositional power.” *Advancing the Line* at 5.

3 8. Once formed, encampments are usually dispersed only after a  
4 “battle” with law enforcement tasked with restoring order. That is a  
5 feature, not a bug. *E.g., id.* at 8 (“The truth is that there was no ‘peaceful  
6 resolution’ to the occupation, because the occupiers refused to allow it. It  
7 was not the administration’s fault that the police were called. The outcome  
8 was forced by the students themselves.”). For example, in one organizer’s  
9 words “the most liberating and radicalizing part of the UCLA encampment  
10 was *fighting the Zionists and police.*” *Id.* at 5 (emphasis added). Because  
11 encampment organizers believe that they are “at war” with “Zionists” and  
12 law enforcement, “a clear militant line of needing to fight the police”  
13 predominates. *Id.* at 3. This culture of “militancy” is intended to “attac[k]  
14 the legitimacy of policing” altogether (i.e., to ensure that law enforcement  
15 cannot protect the rights of Jews from those who seek to trample them).  
16 *Id.* at 6.

17 9. UCLA has been the repeated target of these terroristic tactics,  
18 which have proven sadly effective in rendering campus a hostile  
19 environment for Jews. *See, e.g., Brown, Notice of Findings Regarding the*  
20 *University of California, Los Angeles*, at 7, Dep’t of Just. (July 29, 2025),  
21 [perma.cc/UV66-JE2C](https://perma.cc/UV66-JE2C) (“Jewish and Israeli students at UCLA were  
22 subjected to severe, pervasive, and objectively offensive harassment that  
23 created a hostile environment by members of [a campus] encampment.  
24 Jewish and Israeli students were assaulted, verbally harassed, and  
25 physically prevented from accessing parts of the UCLA campus on the  
26 basis of their actual or perceived race, religion, and/or national origin.”).

27 10. In April 2024, during the height of the “Popular University for  
28 Gaza,” UCLA Chancellor Gene Block issued a statement explaining that

1 students on their way to class were “physically blocked from accessing  
2 parts of the campus” and that a series of violent incidents had put “many  
3 on UCLA’s campus, especially [its] Jewish students, in a state of anxiety  
4 and fear.” An antisemitism task force convened by the university  
5 confirmed Block’s assessment, finding that a large majority of the Jewish  
6 community at UCLA reported that antisemitism had worsened or  
7 significantly worsened since October 7, in large part because of an  
8 encampment that existed between April 25 and May 2, 2024. *Antisemitism*  
9 *and Anti-Israeli Bias at UCLA*, at 20-27, UCLA Task Force to Combat  
10 Antisemitism and Anti-Israeli Bias (Oct. 16, 2024), [perma.cc/2CED-UAJ6](https://perma.cc/2CED-UAJ6).

11 11. The UCLA encampment, like many of its contemporaries under  
12 the banner of SJP’s “Popular University for Gaza,” was a festering sore of  
13 antisemitism, racial exclusion, and violent enmity towards law  
14 enforcement.

15 12. Members of the encampment “occupied” a university building  
16 and restyled it “Intifada Hall.” They also used signs, barricades, and the  
17 walls of “occupied” buildings as canvasses for antisemitic graffiti,  
18 including writing “F\*\*ck all Jews” below a crudely drawn Star of David,  
19 the phrases “Intifada” and “Death 2 Zionism,” and a sign reading that  
20 “Israelis are Native 2 Hell.” *See Antisemitism and Anti-Israeli Bias at*  
21 *UCLA* at 31, 39; Brian van der Brug, Los Angeles Times (*infra* 39-40).  
22 “[A]ntisemitic and Anti-Israeli imagery and messaging” was “everywhere”  
23 at the encampment. *E.g., Antisemitism and Anti-Israeli Bias at UCLA* at  
24 27.

25 13. Encampment organizers “demarcated five zones that Zionists  
26 often tried to breach, limited entry to only two zones, and established a  
27 complex check-in, wristband, and vouching system” to keep out “Zionists.”  
28 *Advancing the Line* at 4. This checkpoint system was enforced by teams of

1 armed members of the encampment and “human phalanxes,” which were  
2 used to “block certain persons from moving freely through public areas”  
3 and “surroun[d] some other individuals to forcibly move them from areas  
4 in or adjacent to the encampment.” *Antisemitism and Anti-Israeli Bias at*  
5 *UCLA* at 53-54, 56-58; *see also Notice of Findings Regarding the University*  
6 *of California, Los Angeles* at 3-5, 7. Like many Jewish students, staff, and  
7 faculty, several Plaintiffs were physically blocked from moving through  
8 the encampment and surrounding areas based on their status as Jews.  
9 One Plaintiff was attacked and robbed by a member of the encampment’s  
10 “security” team when he refused to be redirected. And another Plaintiff  
11 avoided the area because he knew something similar would happen to him  
12 if he did not.

13 14. After UCLA declared the encampment illegal<sup>3</sup> on April 30,  
14 organizers escalated preparations for the fight with police they had been  
15 angling for—stockpiling supplies and relying on a coordinated social media  
16 campaign (including Instagram “collaborations”<sup>4</sup> between several

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17  
18 <sup>3</sup> To be clear, from the beginning “[t]he encampment was in clear  
19 violation of a number of existing content-neutral time, place, and manner  
20 rules issued by UCLA and the greater UC System regarding the use of  
21 campus spaces for expressive activities.” *Notice of Findings Regarding the*  
*University of California, Los Angeles* at 5; *see also Antisemitism and Anti-*

22 <sup>4</sup> As background, an Instagram “collaboration” occurs when the  
23 manager of an Instagram account seeks to share a post with a broader  
24 audience. The posting account chooses one or more additional accounts to  
25 request to “collaborate” with, at which point the managers of the requested  
26 accounts receive a request to participate in the “collaboration.” This  
27 request includes several explanatory disclaimers that make clear agreeing  
28 to collaborate on a post means that the collaborators will be listed as  
authors, that the post will be shared to all collaborators’ followers, and  
that the post will be public if any collaborator’s account can be viewed by  
the public. If the managers of the requested accounts agree to collaborate

1 Defendants) to recruit additional “defenders” from across Los Angeles.  
2 Police issued an unlawful assembly order at 6:00pm the next day, marking  
3 the beginning of what organizers styled the “Battle of UCLA.” After  
4 significant violent resistance, including a coordinated effort by organizers  
5 to “kettle” groups of police, law enforcement successfully swept the  
6 encampment during the early hours of May 2.

7 15. In the months following the sweep, those responsible continued  
8 their campaign of harassment and exclusion by attempting to reestablish  
9 the encampment at several different locations on campus.

10 16. On May 6, police arrested more than 40 people equipped with  
11 metal pipes, bolt cutters, chains and padlocks, and a “Do-It-Yourself  
12 Occupation Guide.” *Statement Regarding the Incidents on May 6, 2024*,  
13 UCLA Police Dep’t (May 8, 2024), [perma.cc/3DFJ-WKXG](https://perma.cc/3DFJ-WKXG).

14 17. On June 10, the same radical core “set up an unauthorized and  
15 unlawful encampment with tents, canopies, wooden shields, and water-  
16 filled barriers” at the top of the Janss Steps. *Statement Regarding the*  
17 *Unlawful Encampments and Subsequent Arrests on Monday, June 10,*  
18 *2024*, UCLA Police Dep’t (June 10, 2024), [perma.cc/V5KA-G83L](https://perma.cc/V5KA-G83L). Like the  
19 original, this new encampment “restricted access to the general public in  
20 violation of University policy” and “disrupted nearby final exams.” *Id.*  
21 After police swept the new encampment, organizers relocated to Kerckhoff  
22 Patio and then to the courtyard between Dodd Hall and the UCLA law  
23 school, setting up illegal encampments at each location. *See id.* Later that  
24 day, members of the group assaulted and threatened to kill Plaintiff Dovid

25 \_\_\_\_\_  
26 after reading the disclaimers, the collaboration is finalized and the post  
27 issues. In short, Instagram “collaboration” necessarily involves an  
28 agreement to promote a particular post and a meeting of the minds  
between the managers of two or more social media accounts.

1 Gurevich, a Chabad rabbi who was at the scene to support Jewish  
2 students. *See* Bandler, *UCLA Chabad Rabbi Assaulted by Pro-Palestinian*  
3 *Protesters*, Jewish Journal (June 11, 2024), [perma.cc/KL93-4GJB](https://perma.cc/KL93-4GJB).

4 18. The “Popular University for Gaza” and the UCLA encampment  
5 have received significant attention from every branch of government.

6 19. In Congress, six House committees produced a comprehensive  
7 report detailing how campus “antagonists ... engaged in antisemitic  
8 behavior, encampments, and intimidating tactics such as campus  
9 checkpoints,” all with the support of “tax-exempt organizations that  
10 enabled and funded violent campus protests.” Staff of H. Comms., 118th  
11 Cong., *H. Antisemitism Staff Rep.* (Dec. 18, 2024), [perma.cc/9NWX-2VWJ](https://perma.cc/9NWX-2VWJ).

12 20. Legislative scrutiny has intensified in 2025, with multiple  
13 congressional committees holding hearings on the underlying causes of the  
14 campus antisemitism epidemic. E.g., *Antisemitism in Higher Education—*  
15 *Examining the Role of Faculty, Funding, and Ideology: Hearing Before the*  
16 *H. Comm. on Educ. and the Workforce*, 119th Cong. (July 15, 2025);  
17 *Antisemitic Disruptions on Campus—Ensuring Safe Learning*  
18 *Environments for All Students: Hearing before the S. Comm. on Health,*  
19 *Educ., Labor, and Pensions*, 119th Cong. (Mar. 27, 2025). The Senate  
20 HELP Committee also launched an investigation into Defendants AJP  
21 Educational Foundation (d/b/a American Muslims for Palestine), Hatem  
22 Bazian, and Osama Abuirshaid based on alleged ties to Hamas and AMP’s  
23 reported “involvement in planning, organizing, and funding campus  
24 demonstrations that have posed significant threats to campus safety.”  
25 Senator Cassidy, Chairman of S. Comm. on Health, Educ., Labor, and  
26 Pensions, *Letter to Hatem Bazian* (Mar. 26, 2025), [perma.cc/VL9N-WVDD](https://perma.cc/VL9N-WVDD).

27 21. In the Executive Branch, President Trump has prioritized  
28 combatting the antisemitism crisis. Exec. Order No. 14188, *Additional*

1 *Measures to Combat Anti-Semitism*, 90 Fed. Reg. 8847-48 (Feb. 3, 2025).  
2 And the Justice Department has formed a multi-agency task force charged  
3 with “eradicate[ing] antisemitic harassment in schools and on college  
4 campuses.” *Federal Task Force to Combat Antisemitism Announces Visits*  
5 *to 10 College Campuses that Experienced Incidents of Antisemitism*, Dep’t  
6 of Just. (Feb. 28, 2025), [perma.cc/6YAR-FZRA](https://perma.cc/6YAR-FZRA). Hundreds of millions of  
7 dollars in federal funds have been frozen at universities that “fail[ed] to  
8 protect students from anti-Semitic harassment on campus.” *E.g., DOJ,*  
9 *HHS, ED, and GSA Announce Initial Cancellation of Grants and Contracts*  
10 *to Columbia University Worth \$400 Million*, Joint Task Force to Combat  
11 Antisemitism (Mar. 7, 2025), [perma.cc/Z39F-SDLP](https://perma.cc/Z39F-SDLP).

12 22. DOJ’s Civil Rights Division also recently concluded that  
13 UCLA’s response to the encampment violated federal civil rights law,  
14 finding that senior UCLA administrators admitted that “the encampment  
15 was unlawful and periodically violent,” that “demonstrators ... physically  
16 prevented Jewish and Israeli students from accessing parts of campus,”  
17 that members of the Jewish community were physically attacked around,  
18 blocked from entering, and forcibly removed from “the occupied area of  
19 Royce Quad,” and that the encampment left Jews on campus “in a state of  
20 anxiety and fear.” *Notice of Findings Regarding the University of*  
21 *California, Los Angeles* at 3-5.

22 23. Finally, this Court found at the preliminary injunction stage in  
23 *Frankel* that the UCLA encampment “was rimmed with plywood and  
24 metal barriers” and “established checkpoints” that “directly interfered  
25 with instruction by blocking students’ pathways to classrooms.” 744 F.  
26 Supp. 3d at 1021-22. But because that case was about UCLA’s woefully  
27 inadequate response to a coordinated campaign of violent racial exclusion,  
28



1 it did not address the third parties that UCLA claimed had “engineered  
2 the exclusion.” *Id.* at 1020.

3 24. In sum, the private parties responsible for the UCLA  
4 encampments—working together to supply them with funding; planning;  
5 administrative, material and operational support; a coordinated  
6 recruitment and training campaign; and a steady supply of incendiary  
7 messages urging members to further their lawless occupation and the  
8 resulting Jew exclusion zone—have never been held accountable.

9 25. Those private parties responsible for the encampment and the  
10 antisemitic violence at UCLA are the Defendants in this case.

11 26. The individuals and unincorporated associations that  
12 organized the encampment on the ground—National Students for Justice  
13 in Palestine (through its UCLA chapter and aided by Doe #1 as part of the  
14 nationwide “Popular University for Gaza” initiative); Faculty for Justice  
15 in Palestine Network (through its UCLA chapter); UC Divest Coalition,  
16 and People’s City Council (through Albert Corado, Jason Reedy, Ricci  
17 Sergienko and their associates).

18 27. The nonprofit organizations that supported the encampment  
19 by channeling funds and providing high-level operational and  
20 organizational support to SJP—WESPAC Foundation and American  
21 Muslims for Palestine.

22 28. Together with a laundry-list of third parties, these Defendants  
23 conspired to create and maintain (or to enable the creation and  
24 maintenance of) the UCLA encampment and its attempted successors  
25 knowing that they were based on class-based animus; that their purpose  
26 and effect was to exclude Jewish students, faculty, and staff from public  
27 spaces using violence and the threat of violence; and that they were  
28

1 violently hostile to law-enforcement efforts to restore order and protect the  
2 rights of Jews.

3 29. Section 1985(3) of the Klu Klux Klan Act prohibits such  
4 conspiracies. Plaintiffs are entitled to relief.

5 **THE PARTIES**

6 **Plaintiffs**

7 30. Plaintiff Nir Hoftman is a Professor at the David Geffen School  
8 of Medicine at UCLA, where he has taught for 22 years. Hoftman is  
9 Jewish.

10 31. Plaintiff Matthew Weinberg is a third-year law student at  
11 UCLA. Weinberg is Jewish.

12 32. Plaintiff Dovid Gurevich is the Rabbi of Chabad House at  
13 UCLA. Rabbi Gurevich is Jewish.

14 33. Plaintiff Eli Tsives is an undergraduate student at UCLA.  
15 Tsives is Jewish.

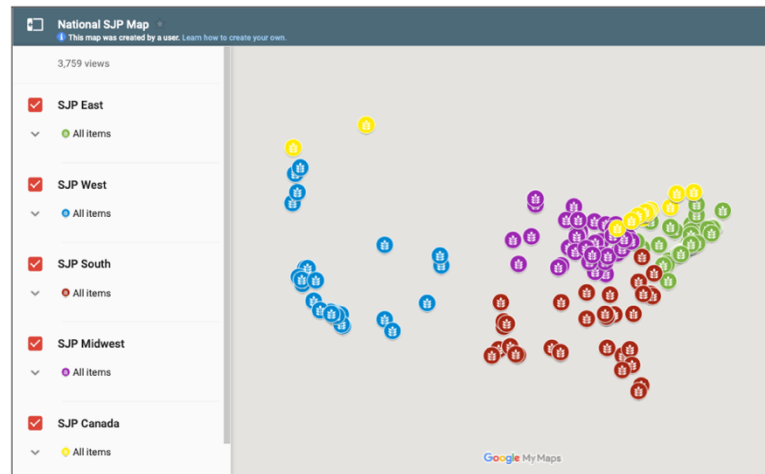
16 **Defendants**

17 34. Defendant National Students for Justice in Palestine is a  
18 nationwide membership association that aims to “develop a connected,  
19 disciplined movement” to “take colleges and universities across North  
20 America by storm.” It is often referred to as “SJP National,” “NSJP,” or  
21 simply “SJP.” SJP has built an “ideologically, politically, and  
22 organizationally unified” network of over 400 campus “solidarity  
23 organizations,” including a (now largely indefinitely suspended) UCLA  
24 chapter with subcomponents for undergraduate students, graduate  
25 students, and professional schools. At the national level, SJP is led by an  
26  
27  
28



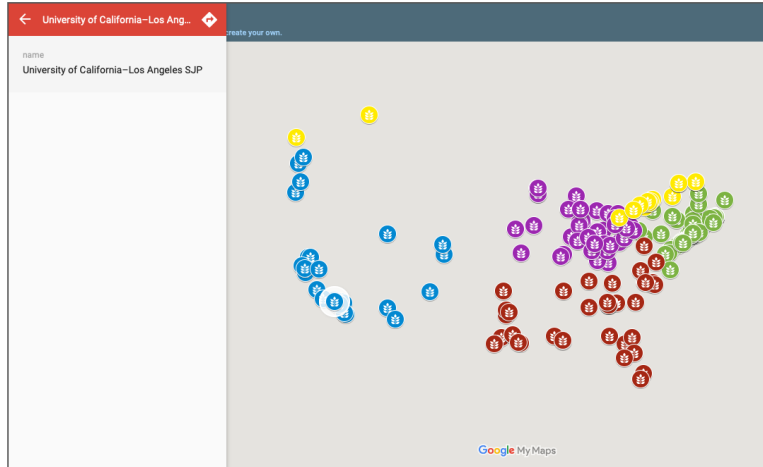
1 anonymous steering committee that regularly cycles its membership to  
2 avoid being held accountable in court.<sup>5</sup>

3 35. Until SJP took down the resource sometime in 2021/2022, it  
4 maintained a “National SJP Map” on its website listing the “SJP/Palestine  
5 solidarity group[s]” that make up its “ideologically, politically, and  
6 organizationally unified” network of campus “solidarity organizations.”  
7 The map included a key dividing the United States and Canada into five  
8 regions: “SJP East,” “SJP West,” “SJP South,” SJP Midwest,” and “SJP  
9 Canada.” The map, which designated SJP chapters at the university level



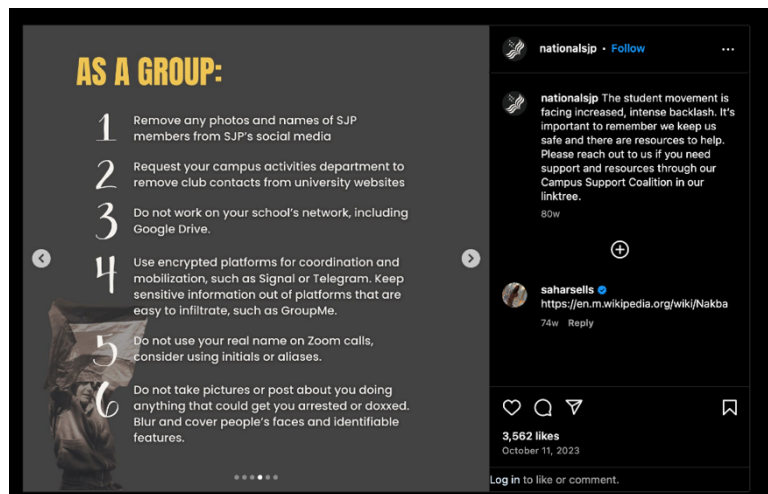
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25  
26 <sup>5</sup> On information and belief, Dylan Kupsh, Sean Eren, and Carrie  
27 Zaremba were members of SJP’s national steering committee when it  
28 launched the “Popular University for Gaza initiative” on April 20, 2024,  
and between April 25, 2024, and June 11, 2024.



(i.e., reporting all SJP operations at a university under one designation rather than differentiating between undergraduate, graduate, and professional school subcomponents), identified “University of California–Los Angeles SJP” as part of “SJP West.”

36. Defendant John Doe #1 was a student at UCLA in 2024, where he served as President (or an equivalent designation) of UCLA’s SJP chapter. SJP instructs its chapters to engage in tactics designed to prevent the identification of high-ranking officials.



37. As a result of these tactics, Plaintiffs have been unable to identify Doe. On information and belief, SJP is aware of Doe’s identity.

1           38. Defendant AJP Educational Foundation, Inc. (d/b/a American  
2 Muslims for Palestine)<sup>6</sup> is a California nonprofit founded by Defendant  
3 Hatem Bazian that provides financial support and organizational capacity  
4 to various campus groups. AMP works in broad-based coalitions and  
5 supports campus activism through SJP and its chapters and Muslim  
6 Student Associations. To that end, AMP employs an “Associate Director of  
7 Outreach & Community Organizing” charged with acting as a liaison to  
8 campus activism groups across the country; helping these groups procure  
9 grants, materials and speakers and to set up programs and activities; and  
10 coordinating AMP’s grassroots organizing to facilitate national coalition  
11 building.

12           39. AMP was significantly involved in the creation of NSJP for the  
13 express purpose of binding campus groups around the country together  
14 into a unified and cohesive advocacy network. In a 2010 conference on  
15 Palestine organized by the U.S. Palestinian Community Network and  
16 sponsored by AMP, a full-page advert bearing AMP’s logo “call[ed] on  
17 Students for Justice in Palestine Chapters to come together as SJP  
18 National.” AMP explained that SJP National’s purpose was to “[u]nite the  
19 work for Palestine on campuses throughout the United States,” to “[o]ffer  
20 support to” and “[s]hare resources, experiences, and knowledge” with SJP  
21 chapters, to help chapters “organize events and find speakers,” and to  
22 “[h]elp facilitate divestment campaigns on your campus.” For those  
23

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24           <sup>6</sup> AJP/AMP utilizes a hybrid corporate structure to obfuscate its  
25 actions and conceal its sources of funding. See Testimony of Jonathan  
26 Schanzer, *From Ivory Towers to Dark Corners: Investigating the Nexus*  
27 *between Antisemitism, Tax-Exempt Universities, and Terror Financing,*  
28 *Hearing before the House Comm. on Ways and Means*, 118 Cong. (Nov. 15,  
2023), at 3, [perma.cc/6PZM-8TWY](https://perma.cc/6PZM-8TWY) (“*Schanzer 2023 Congressional*  
*Testimony*”).

1 interested in more information on the project, AMP listed an official SJP  
2 email, [info@sjpnational.org](mailto:info@sjpnational.org), and its own phone number, (708) 598-4267.<sup>7</sup>

3 AMP calls on Students for Justice in Palestine chapters to come together as

## 4 SJP NATIONAL

5 SJP National seeks to . . .

- 6 1. Unite the work for Palestine on campuses throughout the United States
- 7 2. Offer support to your SJP
- 8 3. Share resources, experience and knowledge
- 9 4. Help you organize events and find speakers
- 10 5. Help facilitate divestment campaigns on your campus

11 For more, information, email [info@sjpnational.org](mailto:info@sjpnational.org) or call 708.598.4267 ext. 21



16 AMERICAN MUSLIMS FOR PALESTINE

[www.ampalastine.org](http://www.ampalastine.org)

17 40. AMP is under investigation for potential terrorist fundraising.  
18 *See Attorney General's Office Opens Investigation into American Muslims*  
19 *for Palestine Nonprofit*, Off. of the Va. Att'y Gen. (Oct. 31, 2023),  
20 [perma.cc/H9FJ-7CNH](https://perma.cc/H9FJ-7CNH); *NJSP: Antisemitism, Anti-Americanism, Violent*  
21 *Extremism, and the Threat to North American Universities*, The Inst. for  
22 the Study of Global Antisemitism & Pol'y 43-44 (2024), [perma.cc/NQ5J-](https://perma.cc/NQ5J-LH9E)  
23 [LH9E](https://perma.cc/NQ5J-LH9E). It is also under investigation by the Senate HELP Committee for

24

25 <sup>7</sup> AJP reported this phone number on its IRS Form 990 in publicly  
26 available filings between 2014 and 2017. *See Nonprofit Explorer: AJP*  
27 *Educational Foundation, Inc.*, ProPublica, [perma.cc/AKL9-3X4X](https://perma.cc/AKL9-3X4X). On  
28 information and belief, the phone number was associated with AJP/AMP  
from AJP's initial incorporation in 2009 to at least 2018.

1 its reported “involvement in planning, organizing, and funding campus  
2 demonstrations that have posed significant threats to campus safety.”  
3 *Letter to Hatem Bazian* at 4.

4 41. None of this is a surprise, given that AMP “frequently engages  
5 in rhetoric that promotes antisemitic tropes and support for violence  
6 against Israel, such as praising Hamas for the October 7, 2023, attack,”  
7 *American Muslims for Palestine (AMP)*, Anti-Defamation League,  
8 [perma.cc/6S2M-JPBT](https://perma.cc/6S2M-JPBT) (archived Mar. 18, 2025), and has reportedly “been  
9 heavily involved in SJP’s development,” *Letter to Hatem Bazian* at 3. For  
10 example, AMP annual conferences feature a “Campus Activism Track”  
11 that is “designed and led by former SJPers” and intended to provide  
12 participants with “the tools and resources you need to strengthen your  
13 presence and pro-Palestinian presence on your campus.”

14 42. Defendant Hatem Bazian is the founder of AJP/AMP<sup>8</sup> and the  
15 Chairman of AMP’s Board of Directors. Under AJP/AMP’s bylaws, the  
16 Chairman (who also serves as President) is the organization’s chief  
17 executive officer and supervises and controls the organization’s affairs and  
18 the activities of its officers. On information and belief, Bazian exercises  
19 these functions on AMP’s behalf, together with Defendant Osama  
20 Abuirshaid. Bazian is also a professor in the University of California,  
21 Berkeley’s Department of Ethnic Studies, the state where he is domiciled.  
22 *See Bazian MTD* (Dkt.71), at 1, *Parizer v. AJP Educational Found., Inc.*,  
23 No. 24-cv-724 (E.D. Va. Sept. 9, 2024).

24 43. Defendant Osama Abuirshaid is AMP’s Executive Director.  
25 Before joining AMP, Abuirshaid worked as the editor of Al-Zaytounah, the  
26

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27 <sup>8</sup> Bazian also reportedly founded the first SJP chapter at Berkeley in  
28 2001. *See Schanzer 2023 Congressional Testimony* at 4.

1 Islamic Association of Palestine’s<sup>9</sup> newspaper. *See Schanzer 2023*  
2 *Congressional Testimony* at 9. On information and belief, Abuirshaid  
3 works together with Bazian to exercise control over AMP’s operations,  
4 including its campus activism efforts.

5 44. Defendant Faculty for Justice in Palestine Network is a  
6 nationwide membership association in the image of SJP. Like SJP, FJP is  
7 made up of chapters at various universities, including UCLA, and is  
8 governed by an anonymous steering committee. FJP supports and  
9 amplifies SJP’s efforts on college campuses around the country to make  
10 public spaces unsafe for Jews. FJP encourages its members to “support  
11 and join” SJP’s efforts on campus and claims that members have “played  
12 a frontline role, physically and materially,” in supporting SJP’s endeavors,  
13 including the “Popular University for Gaza’s” campus encampment  
14 initiative.<sup>10</sup> Today, FJP has rebranded as “Faculty and Staff for Justice in  
15 Palestine” (“NFSJP” or “FSJP”) and boasts more than 130 affiliated  
16 campus chapters, including one at UCLA.

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19 <sup>9</sup> IAP was among the entities held responsible for David Boim’s death  
20 in a Hamas terrorist attack in 1996. *See Boim v. Holy Land Found. for*  
21 *Relief and Dev.*, 549 F.3d 685, 687-88 (7th Cir. 2008).

22 <sup>10</sup> Two professors who were instrumental in forming FJP on a series  
23 of national calls and at a joint meeting of the American Studies Association  
24 and Middle Eastern Studies Association in Montreal—Sherene Seikaly  
25 (UC Santa Barbara) and Andrew Ross (NYU)—have publicly identified  
26 themselves as holding official positions within FJP. Ross identified himself  
27 as “Secretary” and Seikaly identified herself as a “facilitator” or  
28 “moderator.” In the months leading up to the SJP’s launch of the “Popular  
University for Gaza” and the UCLA encampment, Ross and Seikaly gave  
several interviews on FJP. These interviews emphasized that working to  
support SJP was “key” to the organization’s efforts and that doing so  
required “an organized collective voice.”



1           45. Defendant UC Divest Coalition is a California-based  
2           unincorporated association made up of individuals and entities that seek  
3           to pressure the UC system into divesting from, among other things, the  
4           State of Israel. UC Divest maintains a spreadsheet of “Coalition Member  
5           Orgs” including several SJP chapters, the Student Labor Advocacy Project  
6           at UCLA, and Palestinian Youth Movement. In addition to the “UC” in the  
7           coalition’s name appearing to stand for “University of California,” the vast  
8           majority, if not all, of UC Divest’s member organizations appear to be in  
9           California. For example, UCLA’s SJP chapter and its graduate student  
10          subcomponent are both listed as members, as are other SJP chapters at  
11          California universities. UC Divest also has a subcomponent that calls itself  
12          “UC Divest at UCLA,” which appears to be made up of the graduate  
13          student subcomponent of UCLA’s SJP chapter and the “Rank and File for  
14          a Democratic Union Caucus of UAW 4811 at UCLA.”

15          46. A website affiliated with UC Divest at UCLA titled  
16          “Unmasking UCLA” includes the following acknowledgement: “We want  
17          to thank TAHRIR Coalition for supporting the creation of this website.”  
18          TAHRIR Coalition is a similarly structured organization centered around  
19          the University of Michigan that is reported to have organized the  
20          University of Michigan’s campus encampment as part of SJP’s “Popular  
21          University for Gaza” initiative.

22          47. Defendant WESPAC Foundation is a New York nonprofit  
23          organization that acts as a “fiscal sponsor” for SJP and similar  
24          organizations (for example, WESPAC fiscally sponsors Palestinian Youth  
25          Movement via another nonprofit called Honor the Earth). WESPAC’s fiscal  
26          sponsorship means that it receives and administers donations on behalf of  
27          these organizations for use on “projects in the United States.” *See Hobbs*  
28          *et al., Activist Groups Trained Students for Months Before Campus*

1 *Protests*, Wall St. Journal (May 3, 2024), archive.ph/6mv3B; WESPAC,  
2 Anti-Defamation League, perma.cc/TK7M-LFRL (archived Mar. 18, 2025).

3 48. WESPAC has served as SJP’s fiscal sponsor since at least 2019  
4 and was still serving as fiscal sponsor: (1) when SJP launched the “Popular  
5 University for Gaza” on April 20, 2024; (2) during the UCLA encampment  
6 between April 25 and May 2; (3) during Kupsh’s tenure as a member of  
7 SJP’s national steering committee; and (4) until at least July 1, 2024. On  
8 information and belief, on July 27, 2023, WESPAC executed a letter by  
9 which it formally “agreed to serve as NSJP’s fiscal sponsor.” *See* Compl.  
10 (Dkt.1) ¶35, *ANI v. WESPAC Foundation*, No. 1:25-cv-1320 (S.D.N.Y. Feb.  
11 13, 2025).

12 49. On information and belief, WESPAC’s relationship with SJP  
13 under the July 2023 fiscal sponsorship agreement was consistent with the  
14 following definition of the term “Fiscal Sponsor” contained in WESPAC’s  
15 insurance policy: “[T]he first Named Insured’s status as the entity or  
16 organization which offers its legal and tax-exempt status to another  
17 person, entity or organization pursuant to a “fiscal sponsor agreement”;  
18 who participates in the operations of that person, entity or organization by  
19 receiving assets and incurring liabilities for the mutual benefit of pursuing  
20 charitable goals; and in consideration for the benefit of that person, entity  
21 or organization *has assumed responsibility to manage programs, events,*  
22 *revenue, grants, contributions, contracts and/or insurance programs.”* *Id.*  
23 ¶40 (emphasis added).

24 50. Defendant People’s City Council is a Los Angeles-based  
25 unincorporated association that describes itself as an “abolitionist, anti-  
26 capitalist, and anti-imperialist collective.” To the extent it has an office or  
27 headquarters, People’s City Council appears to have been based out of the  
28 Robinson S.P.A.C.E., which is located at 4308 Burns Ave, Los Angeles, CA



1 90029, at the time of the UCLA encampment. People’s City Council  
2 maintains several active social media accounts and produces a podcast  
3 called “People’s City Propaganda.” Jason Reedy, Albert Corado, and Ricci  
4 Sergienko are all organizers associated with People’s City Council who are,  
5 on information and belief, California residents living in or around Los  
6 Angeles. Reedy and Corado produce most, if not all, episodes of People’s  
7 City Propaganda. Based on statements on social media and a July 19,  
8 2024, episode of People’s City Propaganda titled “Student Intifada,” Reedy,  
9 Corado, and Sergienko were all on-site at the first UCLA encampment for  
10 at least some time between April 25, 2024, and May 2, 2024.

### 11 **JURISDICTION AND VENUE**

12 51. This Court has subject-matter jurisdiction because Plaintiffs  
13 seek to recover for violations of their civil rights that “aris[e] under the  
14 Constitution [and the] laws ... of the United States.” 28 U.S.C. §1331; *see*  
15 *also id.* §1343 (granting district courts original jurisdiction over §1985  
16 claims).

17 52. Venue is proper under 28 U.S.C. §1391(b)(2) because “a  
18 substantial part of the events or omissions giving rise to [Plaintiffs’ claims]  
19 occurred” in the Central District of California, specifically in and around  
20 the City of Los Angeles and on UCLA’s campus. *See, e.g., Frankel*, No. 2:24-  
21 cv-04702-MCS-PD (C.D. Cal.).

22 53. As alleged in more detail below, each Defendant is subject to  
23 either general or specific personal jurisdiction in this Court.

24 54. Because Bazian is domiciled in California he is subject to  
25 general personal jurisdiction.

26 55. Because AJP is incorporated in California, it and its d/b/a AMP  
27 are subject to general personal jurisdiction.  
28

1           56. If Doe is domiciled in California, he is likewise subject to  
2 general jurisdiction (if not, he is clearly subject to specific jurisdiction  
3 based on his and SJP's role in organizing the encampment).

4           57. Although it is an unincorporated association, People's City  
5 Council appears to maintain its only physical office in Los Angeles and to  
6 be made up of California residents from in and around Los Angeles. It is  
7 thus sufficiently at home in California to be subject to general personal  
8 jurisdiction.

9           58. Although it is an unincorporated association, UC Divest's focus  
10 on the University of California System and the fact that its membership  
11 appears to be made up of almost entirely California-based constituent  
12 organizations strongly suggests that it is sufficiently at home in California  
13 to be subject to general personal jurisdiction.

14           59. NSJP, WESPAC, FJP, and Abuirshaid are subject to specific  
15 jurisdiction because each has sufficient minimum contacts with California  
16 and Plaintiffs' claims both arise out of and relate to those contacts.

17           60. **NSJP**. On April 20, 2024, SJP launched the nationwide  
18 "Popular University for Gaza" initiative of which the UCLA encampment  
19 was a crown jewel. The "Popular University" was a "coordinated pressure  
20 campaign against university administrations and trustees" linked to a  
21 nationwide effort to "establis[h] autonomous zones on several university  
22 campuses." SJP created a logo and mission statement for the initiative,  
23 which it would promote using national social media accounts for the next  
24 several weeks. During this period, almost every post from SJP's national  
25 social media accounts was about the initiative.

1           61. On April 24, 2024, SJP’s national Instagram account  
2 “collaborated”<sup>11</sup> with a Southern California regional chapter called  
3 SoCalSJP,<sup>12</sup> Palestinian Youth Movement, and a regional Palestinian  
4 Youth Movement chapter covering Los Angeles, Orange County, and the  
5 Inland Empire area. The collaboration urged students in Southern  
6 California to “reclaim [their] universities” and included the following  
7 rallying cry: “Join us! Find an encampment, protest, walkout, or other  
8 mobilization happening near you and stand alongside encampments  
9 across the country in solidarity with Gaza!”

10           62. The same day it collaborated with SoCalSJP, SJP’s national  
11 social media account also collaborated with Defendant People’s City  
12 Council on an Instagram post announcing a “Popular University for Gaza”  
13 encampment at USC that encouraged non-students from around Los  
14 Angeles to join the encampment.

15           63. On April 25, UCLA’s SJP chapter organized a campus  
16 encampment together with UC Divest (which included several more SJP  
17 chapters under its umbrella), People’s City Council, and additional third  
18 parties.

19           64. SJP promoted the encampment using its national social media  
20 accounts and encouraged its followers to join and support the  
21 encampment, including by “collaborating” on an Instagram post with its  
22  
23

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24           <sup>11</sup> *See supra*, note 4.

25           <sup>12</sup> “SoCalSJP” describes itself as a “regional coalition of 21 SJP  
26 chapters and allied organizations across Southern California, representing  
27 undergraduate, graduate, and law students” at several universities and  
28 colleges. The list of member-chapters includes an undifferentiated  
“University of California, Los Angeles” entry as well as several chapters  
or other entities affiliated with UC Divest.

1 UCLA chapter, UC Divest at UCLA, and People's City Council featuring a  
2 statement from the encampment and an exhortation to "Join Us!"

3 65. After the encampment was declared illegal on April 30, SJP's  
4 national Instagram account again collaborated with Palestinian Youth  
5 Movement and SoCalSJP. The May 1 collaboration identified a "moment  
6 of escalation" and exhorted "🇸🇵🇯 WE ARE ALL SJP! SHOW UP TO THE  
7 ENCAMPMENTS 🇸🇵🇯."

8 66. Later that day, SJP's national Instagram account authored or  
9 collaborated on the following posts (generally with some combination of  
10 Palestinian Youth Movement, SJP chapters, and UC Divest elements):





67. At the same time all this was happening, Kupsh was domiciled in California and serving in leadership positions with UC Divest, several of its constituent organizations, the graduate student subcomponent of UCLA's SJP chapter, and SJP's national steering committee.<sup>13</sup> Kupsh attended the UCLA encampment and on information and belief helped

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<sup>13</sup> At some point in 2024, Dylan Kupsh ran for a statewide union position while affiliated with the Rank and File for a Democratic Union. Kupsh's campaign announcement identified himself as an "organizing member" for the Student Labor Advocacy Project; an "organizing member" for the graduate student subcomponent of UCLA's SJP chapter; a member of SJP's national steering committee; and a "Founding UC Divest Steering Committee Member." *Dylan Kupsh for ASE Statewide Chair*, RFDU (archived Nov. 16, 2024), [perma.cc/5PYF-LL8Q](https://perma.cc/5PYF-LL8Q). On information and belief, Kupsh was a member of all of these organizations when SJP launched the "Popular University for Gaza" on April 20, 2024, during the UCLA encampment, and until his resignation from SJP's national steering committee sometime in January 2025.



1 organize it, all from California (more specifically, UCLA’s campus and the  
2 surrounding area). On information and belief, Kupsh’s work on the  
3 “Popular University for Gaza” initiative for SJP, including any vote to  
4 issue SJP’s April 20, 2024, statement launching the initiative, occurred in  
5 California.

6 68. Based on SJP’s official social media engagement and Kupsh’s  
7 cross-cutting affiliations, on information and belief, SJP’s national  
8 steering committee was aware of the UCLA encampment.

9 69. **WESPAC.** WESPAC served as SJP’s fiscal sponsor (on  
10 information and belief under the July 2023 fiscal sponsor agreement  
11 discussed in *ANI v. WESPAC*) before, during, and after the launch of the  
12 “Popular University for Gaza” initiative and the UCLA encampment.

13 70. There are six known viable models of fiscal sponsorship,  
14 including several (*e.g.*, the “Direct Project” and “Contractor” models) that  
15 are characteristic of a common-law agency relationship and thus typically  
16 result in the sponsor being partially or completely liable to third parties  
17 for the sponsored project’s acts. *See* Adler & Colvin, *Fiscal Sponsorship—*  
18 *6 Ways To Do It Right*, 8 (3d ed. 2019). Several other models require the  
19 sponsored project to have secured its own status as a 501(c)(3) nonprofit or  
20 to receive grants from the fiscal sponsor that are then reportable on the  
21 sponsor’s Form 990. *See Id.* No matter the arrangement, the IRS’s  
22 longstanding position is that fiscal sponsors must “retai[n] control and  
23 discretion over use of the funds” collected for a sponsored project to comply  
24 with the law.<sup>14</sup>

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25 <sup>14</sup> IRS Rev. Rul. 68-489, [perma.cc/7YP7-LQGJ](https://perma.cc/7YP7-LQGJ); *see also* IRS Rev. Rul.  
26 63-252, [bit.ly/3JEW0V5](https://bit.ly/3JEW0V5) (explaining that “contributions received by [a]  
27 domestic organization” and then distributed to a non-exempt foreign  
28 organization are exempt if they are not “earmarked in any manner” and  
“the use of such contributions will be subject to control by the domestic

1           71. Although WESPAC's most recent Form 990 reports significant  
2 grants to Palestinian Youth Movement via Honor the Earth, it has not  
3 identified any funding streams or grants directed specifically towards SJP.  
4 Because WESPAC has not, to Plaintiffs' knowledge, ever reported a grant  
5 to SJP, and SJP does not appear to have its own 501(c)(3) status, Plaintiffs  
6 have reason to believe that discovery will reveal that SJP was, at least for  
7 some purposes, functioning as WESPAC's agent under the fiscal  
8 sponsorship agreement at the time the former launched the "Popular  
9 University for Gaza" initiative and the UCLA encampment.

10           72. On information and belief (and consistent with its failure to  
11 report any grants to SJP on its Forms 990 during the relevant period)  
12 WESPAC's fiscal sponsorship relationship with SJP required WESPAC to  
13 exercise discretion and ultimate control over the use of all funds donated  
14 to SJP through the donation portal on SJP's website until at least when  
15 the donation portal was taken down sometime in late 2024.

16           73. On information and belief (and consistent with its reported  
17 surveillance of social media accounts related to grant projects reported to  
18 the IRS on its Forms 990), WESPAC monitored at least SJP's national  
19 social media accounts, which promoted the "Popular University for Gaza"  
20 and the UCLA encampment, for the duration of its fiscal sponsorship.

21  
22 \_\_\_\_\_  
23 organization"); IRS Rev. Rul. 66-79, [bit.ly/429jech](https://bit.ly/429jech) ("The test in each case  
24 is whether the organization has full control of the donated funds, and  
25 discretion as to their use, so as to insure that they will be used to carry out  
26 its functions and purposes."); *Letter to Rep. Ken Buck*, IRS 2019-0007 (June  
27 28, 2019), [perma.cc/56B8-HCQ6](https://perma.cc/56B8-HCQ6) (confirming that exempt organizations  
28 must retain "control and discretion as to the use of the funds," maintain  
"records establishing the funds were used for Section 501(c)(3) purposes,"  
and limit "distributions to specific projects that further its own exempt  
purposes").

1           74. On information and belief, at least some of the donations  
2 WESPAC collected on SJP's behalf under the fiscal sponsorship agreement  
3 were used to support either the "Popular University for Gaza," of which  
4 the UCLA encampment was part, or the "Campus Support Coalition,"  
5 which is "a collective of organizations managed by National SJP that work  
6 together to support students fighting for Palestinian liberation on  
7 university campuses."

8           75. On information and belief, UCLA's SJP chapter, UC Divest  
9 (including through its constituent organizations), and other organizations  
10 involved in the UCLA encampment requested and received at least some  
11 support from the Campus Support Coalition.

12           76. **FJP**. FJP was created with the primary objective of  
13 coordinating faculty support for university SJP chapters across the  
14 country shortly before SJP launched the "Popular University for Gaza"  
15 initiative. Consistent with FJP's "Principles of Unity," UCLA's FJP  
16 chapter actively coordinated with its SJP chapter to support the  
17 encampment. Two members of UCLA's FJP chapter, Graeme Blair and  
18 Gina Viola Peake, alleged in a recent state-court lawsuit that they were  
19 present at the encampment in supporting roles. The same lawsuit alleged  
20 that FJP and SJP hosted a joint call on April 30, 2024, that resulted in  
21 some FJP members signing up to an SJP list of "faculty representatives."  
22 It appears that several of these faculty representatives ended up serving  
23 on the encampment's "security" teams. The UCLA FJP Instagram account  
24 also encouraged members to excuse the absences of students who missed  
25 class to attend the encampment.

26           77. **Abuirshaid**. Abuirshaid served as executive director of  
27 AJP/AMP (a California corporation) before, during, and after the launch of  
28 SJP's "Popular University for Gaza" initiative and the UCLA



1 encampment. On information and belief Abuirshaid exercised significant  
2 control over the organization's operations, including its operations in  
3 support of SJP, together with Bazian, a California resident. On  
4 information and belief, AMP provided at least some support to both SJP's  
5 national steering committee and individual SJP chapters in California  
6 that were either involved in the UCLA encampment or constituent  
7 organizations within UC Divest.

### 8 **BACKGROUND**

9 78. The "Popular University for Gaza" did not occur in a vacuum.  
10 Neither did the original UCLA encampment or subsequent efforts to  
11 reestablish the encampment after it was dispersed by law enforcement. To  
12 borrow a phrase familiar to Defendants, these events were merely an  
13 "escalation" in the ongoing campus antisemitism crisis at UCLA and  
14 around the country.

#### 15 **A. The October 7 attack and the subsequent surge of 16 antisemitism in the United States.**

17 79. On October 7, 2023, the foreign terrorist organization Hamas  
18 launched a brutal attack on Israel that "resulted in the murder of nearly  
19 1,200 people," including "more than 40 American citizens." *Antisemitism*  
20 *on College Campuses Exposed* at 1. Almost two years later, 48 men and  
21 women, including two Americans, are still being held hostage by Hamas  
22 and its terrorist allies. *Who Are the Hostages Still Held By Hamas?*, Am.  
Jewish Comm. (Sept. 2, 2025), [perma.cc/5SZJ-KQ6J](https://perma.cc/5SZJ-KQ6J).

23 80. "In the aftermath of [this] horrific event, American institutions  
24 of higher education were upended by an epidemic of hate, violence, and  
25 harassment targeting Jewish students." *Antisemitism on College*  
26 *Campuses Exposed* at 1; see also Louis D. Brandeis Center for Human  
27 Rights Under Law, *Public Interest Law Firm Launched to Specialize in*  
28

1 *Anti-Semitism Litigation* (Feb. 6, 2025), [perma.cc/AQ83-PNKS](https://perma.cc/AQ83-PNKS) (describing  
2 the surge in antisemitic incidents after October 7).

3 81. Students, faculty, staff, and other members of campus Jewish  
4 communities “faced an unrelenting barrage of discrimination; denial of  
5 access to campus common areas and facilities, including libraries and  
6 classrooms; and intimidation, harassment, and physical threats and  
7 assault.” Exec. Order No. 14188, 90 Fed. Reg. 8847-48.

8 82. One obvious aggravator has been SJP’s promulgation of  
9 Hamas’s blueprint for antisemitic conduct. Immediately following October  
10 7, NSJP distributed a “Day of Resistance Toolkit” that called for a  
11 “national day of resistance on college campuses” just days after the attack.  
12 The toolkit characterized a murderous terrorist attack as “surprise  
13 operation against the Zionist enemy” that was a “historic win.” The toolkit  
14 also exhorted SJP “chapters to host demonstrations on campus/in their  
15 community”—an effort SJP promised to support by teaching chapters  
16 “‘how to organize a protest,’ including roles, security, media training, and  
17 more, on [SJP’s next] National Call-in meeting.” It also included a survey  
18 designed to “better coordinate and unify nationally as a student  
19 movement,” and offered “additional help organizing or planning your  
20 protest” to anyone who needed it.

21 83. Tragically, the wave of antisemitic violence that began on  
22 October 7 and metastasized to college campuses has continued well into  
23 2025.

24 84. In April 2025, Pennsylvania Governor Josh Shapiro was the  
25 victim of an arson attack on the first night of Passover. *See Conference of*  
26 *Presidents Condemns Antisemitic Arson Attack Targeting Governor Josh*  
27 *Shapiro*, Conf. of Presidents of Major Am. Jewish Orgs. (Apr. 17, 2025),  
28 [perma.cc/AQ83-PNKS](https://perma.cc/AQ83-PNKS).

1           85. In May 2025, two staffers at the Israeli embassy in D.C. were  
2 murdered in cold blood outside the Capital Jewish Museum by a gunman  
3 who allegedly shouted “Free Palestine” during the shooting. *See*  
4 Indictment ¶7 (Dkt.27), *United States v. Rodriguez*, No. 25-cr-224 (D.D.C.  
5 Aug. 6, 2025).

6           86. And in June 2025, an attacker motivated by hatred of  
7 “Zionist[s]” threw two Molotov cocktails at a Jewish event calling attention  
8 to hostages held in Gaza, resulting in multiple serious injuries. *See*  
9 Indictment ¶8 (Dkt.20), *United States v. Soliman*, No. 25-cr-194 (D. Colo.  
10 June 24, 2025). One victim, an 82-year-old woman, later “died tragically  
11 as a result of the severe injuries that she suffered in the attack.” *Press*  
12 *Release—Pearl Street—Amended and Added Charges*, Boulder Cnty. (June  
13 30, 2025), [perma.cc/PP9F-YUMA](https://perma.cc/PP9F-YUMA) (explaining that prosecutors filed an  
14 amended criminal complaint alleging two counts of first-degree murder).

15 **B. Antisemitism and intimidation at UCLA following October 7.**

16           87. Like college campuses around the country, UCLA was ground  
17 zero for the post-attack surge in antisemitism.

18           88. Two days after the massacre, “an official statement issued by  
19 the Undergraduate Student Association Council (USAC) Cultural Affairs  
20 Commissioner” praised Hamas, stating that the Commissioner “honor[ed]  
21 the Palestinians on the frontlines taking their land and sovereignty back!  
22 From the River to The Sea.” *Antisemitism and Anti-Israeli Bias at UCLA*  
23 at 47 & n.66.<sup>15</sup>

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24  
25           <sup>15</sup> A tent with the Cultural Affairs Commission’s official branding  
26 was set up at the UCLA encampment on the day the encampment was  
27 established. The Cultural Affairs Commission’s Instagram account  
28 released a “collaboration” with UCLA SJP’s chapter the same day  
showcasing the tent and encouraging the account’s followers to “Join our  
liberation zone.”

1           89. A month later, protesters on UCLA’s campus screamed “beat  
2 that f\*\*cking Jew” during an anti-Israel parade as they slammed bats into  
3 an effigy of Israeli Prime Minister Benjamin Netanyahu. *See*  
4 @NewYorkPost, *UCLA students batter Bibi piñata to chants of ‘beat that*  
5 *f-g Jew’*, YouTube (Nov. 10, 2023), [perma.cc/Z9Q3-QCBA](https://perma.cc/Z9Q3-QCBA).

6           90. Anti-Israel marches and rallies at UCLA regularly featured  
7 chants of antisemitic “slogans, including ‘Intifada,’ ‘from the river to the  
8 sea, Palestine will be free,’ and ‘kill the Jews.’” *Antisemitism and Anti-*  
9 *Israeli Bias at UCLA* at 46 & nn.54-56. Throughout, protestors have  
10 sought to avoid accountability and to paralyze Jewish students with fear  
11 by concealing their faces in violation of university rules. *Id.* at 50 & nn.79-  
12 81.

13           91. There have also been “multiple reports of graffiti and drawings  
14 ... that [are] blatantly antisemitic and anti-Israeli.” *Id.* at 63 (discussing  
15 examples of swastikas and a Star of David accompanied by the phrase  
16 “step here”).

17 **C. The Popular University for Gaza and the UCLA Encampment.**

18           92. Things only got worse when SJP announced the “Popular  
19 University for Gaza,” a “coordinated pressure campaign against university  
20 administrations and trustees” based on “establis[hing] autonomous zones  
21 on ... university campuses” like UCLA. On information and belief, UCLA  
22 graduate student Dylan Kupsh had a substantial role in the decision to  
23 launch this nationwide initiative in his role as a member of SJP’s national  
24 steering committee.

25           93. Less than a week after SJP kicked off the Popular University  
26 for Gaza, UCLA’s SJP chapter established a fortified encampment near  
27 Royce Quad in collaboration with UC Divest (of which Kupsh was also a  
28 leading member), People’s City Council, and a host of other similar

1 organizations. UC Divest and UCLA's SJP chapter took public credit for  
2 organizing the encampment.

3 94. An anonymous organizer who authored an article on the UCLA  
4 encampment for a militant leftist publication called Unity of Fields has  
5 provided a detailed timeline of the encampment's creation and expansion,  
6 including the following observations:

- 7 a. That organizers "chose a strategic hilltop location to avoid  
8 taking the low ground beneath Zionists and police." Then, "[i]n  
9 the 48 hours prior to the morning of 4/25/24, [they] crept onto  
10 Royce Quad to set up, organizers amassed a large quantity of  
11 scrap wood and pallets to assemble barricades immediately."
- 12 b. That the "encampment required a logistics team for food,  
13 water, barricades, and medical supplies, a medic team to  
14 administer care, a media team to interface with journalists,  
15 and a security team to prevent the university, the police, and  
16 local fascists from harming the community" and was sustained  
17 by an "effort to maintain a militant, disciplined movement."
- 18 c. That members of the encampment were "a militant,  
19 confrontational force of students and community members  
20 committed to risking and sacrificing in solidarity with  
21 Palestine," in large part because "[m]ilitancy was pushed and  
22 nurtured by leadership that treated the encampment like the  
23 war zone it was." Thus, after the first day "[t]hose who were not  
24 serious about defending the camp saw themselves out, and  
25 those who stayed despite the risks were radicalized and became  
26 heavily invested."
- 27 d. That the encampment was "radicaliz[ed] to the point of fighting  
28 the pigs for 6 hours [when law enforcement attempted to clear

1 the encampment on May 1 and May 2]” by “a combination of  
2 strong leadership and collective buy-in that disciplined and  
3 empowered the right people to become militants.” Put  
4 differently, “initiating and building support for disciplined,  
5 courageous, and controlled counter offensives was the essential  
6 role of militant leadership.”

7 e. That “[o]n April 28th, encampment leaders sketched a plan on  
8 how to expand the barricades,” creating an “expanded  
9 perimeter” that “would use the walls of the adjacent buildings  
10 to [their] advantage, limiting Zionist access to two sides” while  
11 also “escalat[ing] the disruptive effect of the encampment, since  
12 Royce Hall and Powell would become non-functional for public  
13 use when absorbed into the perimeter.”

14 f. That the encampment included contributions from “non-direct  
15 actionist community support, mostly non-student, and often  
16 from cultural groups or organizations focused on housing,  
17 education,” including “local Arabs and Muslims that didn’t  
18 organize but would show up for Palestine” plus “autonomous  
19 anarchists and direct actionists, as well as from the  
20 progressive, non-activist student body who did not belong to  
21 any organizations or affinity groups.”

22 g. That “[t]he makeup of encampment leads was also varied,  
23 though mostly affiliated with undergraduate and graduate  
24 Students for Justice in Palestine and the Rank-and-File  
25 Caucus for a Democratic Union, UAW 4811.”

26 h. That some members of the encampment “were adults who had  
27 lived in L.A for years and had organized for even longer, with  
28 experience in direct action and connections to local non-student

1 organizations and/or autonomous action networks.” See  
2 *Advancing the Line*.

3 95. The Unity of Fields article continued in a section titled “Beyond  
4 Free Speech—Forcing Confrontation with the Pigs”:

- 5 a. That “[a]s militants we must sharpen contradictions and not  
6 allow facades of legitimacy to obfuscate our struggle; at UCLA  
7 this meant abandoning the spectacle of protest which the  
8 administration was friendly to and provoking them into open  
9 conflict with us.”
- 10 b. That “the act of expanding [the encampment’s] barricades”  
11 “served as an escalatory tactic” and “a form of fighting back  
12 attackers” that “demonstrat[ed] that [members of the  
13 encampment] effectively kept each other safe through  
14 nonpeaceful methods.”
- 15 c. That the encampment was “escalating in calculated steps due  
16 to the militant leadership that kept pushing the camp to be  
17 bolder.”
- 18 d. That members of the encampment “caused [their] confrontation  
19 with the pigs.”
- 20 e. That, after UCLA police announced their intent to clear the  
21 encampment on May 1, 2025, members “collected gas masks,  
22 handed out goggles and helmets, and prepared to hold our  
23 ground while the pigs slowly staged.”
- 24 f. That “[c]ommunity members from all over Los Angeles were  
25 “still flooding into Westwood to support the camp defense”  
26 around 1:00am on May 2.
- 27 g. That, after a group of police breach the encampment around  
28 2:00am, “[s]upporters outside the encampment [made] it



1 difficult for more cops to follow the first contingent, and energy  
2 build[t] as it bec[ame] clear that the pigs [were] kettled by  
3 protestors who vastly outnumber them.”

4 h. That the organizer “remember[ed] the fear in the eyes of 30  
5 LAPD officers when [members of the encampment] kettled  
6 them and drove them from the encampment.”

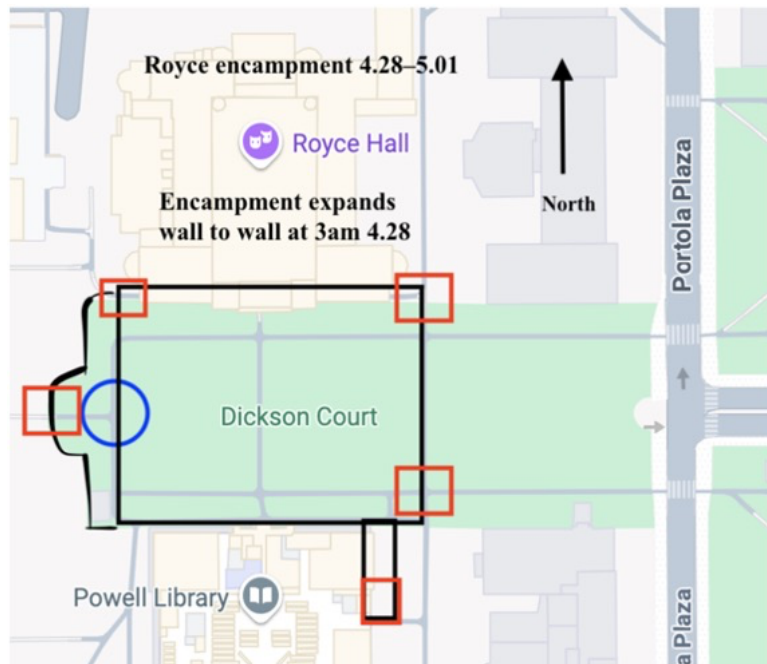
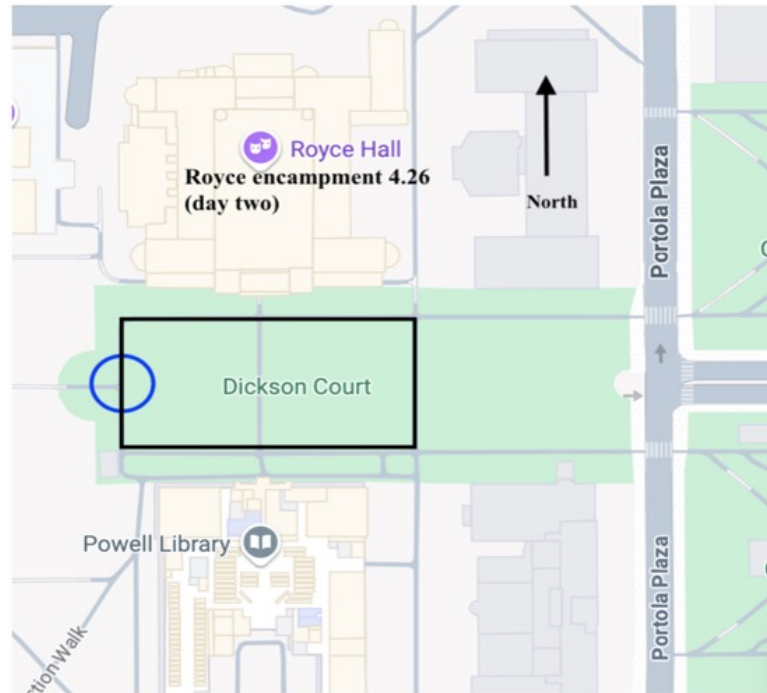
7 i. That “[t]he militancy of the UCLA encampment attacked the  
8 legitimacy of policing.”

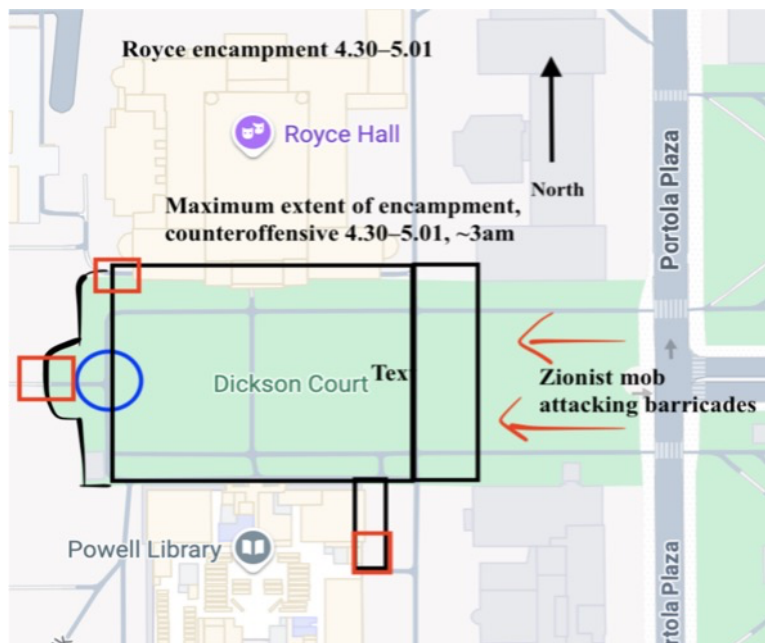
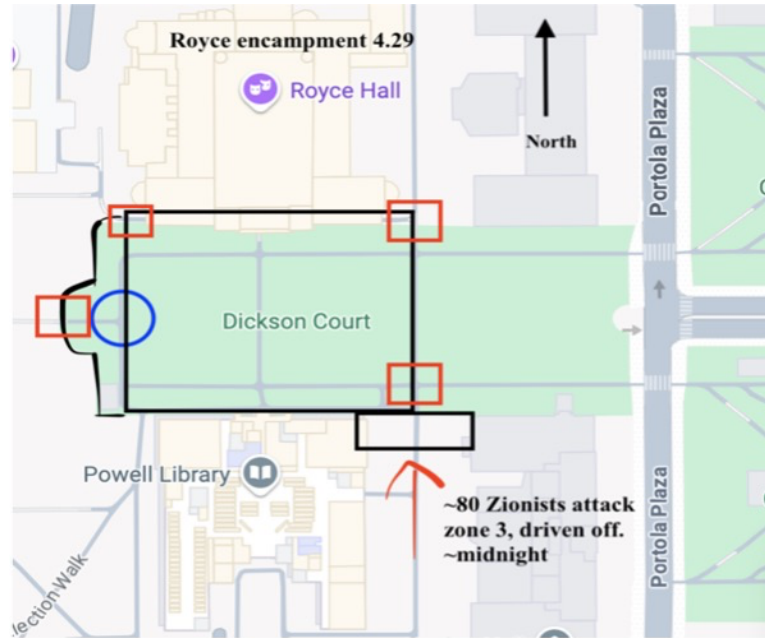
9 j. That “[m]edia strategy has a different function and orientation  
10 in a movement than ideological line or political education, and  
11 there was some value in publicly describing” members of the  
12 encampment as peaceful protestors “in mainstream outlets to  
13 gain popular support.” And that “certain strategies of the  
14 movement like lawsuits must preserve the logic of certain  
15 narratives in order to make a coherent claim.”

16 k. And finally, that “the purpose of the encampments was never  
17 to indulge in new social models. *The purpose was to cost the*  
18 *university money, to physically disrupt, and to express mass*  
19 *oppositional power.* To that end I would emphasize, explicitly  
20 and repeatedly, that the most liberating and radicalizing part  
21 of the UCLA encampment was *fighting the Zionists and police.*”  
22 *See Advancing the Line* (emphasis added).



96. The article also included a series of maps illustrating of the encampment's progression:





\*16

97. These maps, together with the organizer's detailed account, show that members of the encampment were well organized; well supplied; in constant communication with numerous third-party groups (student and non-student) that were determined to aid the encampment; ready and

<sup>16</sup> See *Advancing the Line*, [perma.cc/E39G-RP9N?type=image](https://perma.cc/E39G-RP9N?type=image) (version of the article with maps).

1 able to use violence against their perceived enemies; and above all else,  
2 eager to “figh[t] the Zionists and the police.”

3 98. Consistent with this account, “[v]iolence was documented at  
4 the encampment and the surrounding area as early as April 25, 2024, with  
5 some Jews, Israelis, and pro-Israel protestors assaulted.” *Antisemitism*  
6 *and Anti-Israeli Bias at UCLA* at 57.

7 99. Antisemitic rhetoric and imagery on campus also intensified  
8 during the encampment. Each of these images was captured in or around  
9 the “occupied” area of Royce Quad:







1        100. A van festooned with Swastikas and other anti-Jewish imagery  
2 also parked outside the encampment, blaring antisemitic propaganda from  
3 a bullhorn and speaker system.

4        101. All this violence and fearmongering had a point—to support the  
5 encampment’s “human phalanxes” and “checkpoints,” which made sure  
6 that Jewish students were denied access to public spaces “occupied” by the  
7 encampment. *Antisemitism and Anti-Israeli Bias at UCLA* at 53-54, 56.

8        102. An internal report commissioned by UCLA called out the  
9 university’s deep dysfunction in (failing to) address these disturbing acts,  
10 which violated California law and university policy. *See Antisemitism and*  
11 *Anti-Israeli Bias at UCLA*. In short, the university’s response was too little  
12 and too late. *See generally Notice of Findings Regarding the University of*  
13 *California, Los Angeles*. And it failed to materialize at all until the  
14 situation had deteriorated to just short of open warfare.

15        **D. The individuals and organizations funding and coordinating**  
16        **antisemitism at UCLA.**

17        103. SJP (through its national social media account, its regional  
18 SoCalSJP social media account, and its UCLA chapter’s social media  
19 accounts), UC Divest (through its constituent organizations and UC Divest  
20 at UCLA), People’s City Council, Doe, and FJP used electronic  
21 communications platforms including, on information and belief,  
22 Instagram, Twitter/X, Bluesky, and Google Docs as part of a coordinated  
23 effort to plan, execute, supply, reinforce, and “defend” the encampment  
24 against “Zionists and the police.”

25        104. For example, SJP, People’s City Council, UC Divest, and FJP—  
26 alongside other student and non-student organizations supporting the  
27 encampment—frequently posted Instagram “collaborations”<sup>17</sup>

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28        <sup>17</sup> *See supra*, note 4.

1 encouraging their followers to show up at the encampment, often with the  
2 strong implication that new arrivals should be ready for a fight with  
3 “Zionists,” “the police,” or both.

4 105. These efforts were fueled by antisemitic animus and  
5 undertaken with the knowledge that the purpose and effect of surging  
6 more people into the unlawful encampment would be to deny Jewish  
7 students access to an ever-growing area around Royce Quad, including the  
8 occupied buildings at Royce Hall and Powell Library. As law enforcement  
9 moved closer to declaring the encampment illegal, the posts took on an  
10 even more militant tone. By the morning of May 1st, it was clear that  
11 continued efforts to recruit to the encampment were about building a  
12 sufficiently large mass of violent rioters to physically and forcibly resist  
13 attempts by police to restore order and protect the civil rights of Jews that  
14 had been, sometimes literally, trampled on over the past week.

15 106. The close coordination between these Defendants is also  
16 evidenced by the speed and efficiency with which the encampment was  
17 built, erecting a fortified camp out of the dust using construction materials  
18 and barricades less than a week after SJP announced a national pressure  
19 campaign focused on “autonomous zones” on university campuses and  
20 before university officials could react. Of course, it is no surprise that  
21 UCLA would be among the first to respond to this call, as Dylan Kupsh—  
22 a member of SJP’s national steering committee—was simultaneously a  
23 leader in no fewer than four of the organizations that worked together to  
24 create the encampment. First-hand accounts (later confirmed by the  
25 organizer’s article for Unity of Fields) explained that the encampment was  
26 “surrounded by barricades” constructed by members drilling through  
27 layers of pallets to build makeshift fortifications. This was not the work of  
28



1 an uncoordinated rabble caught up in the heat of the moment, it was a  
2 well-planned, coordinated, and executed operation.

3 107. A key element of the plan was recruiting manpower and  
4 requisitioning supplies from outside the UCLA community to sustain and  
5 grow the encampment, thus increasing the pressure on university officials  
6 to negotiate and make concessions and heightening the threat to Jewish  
7 students, staff, and faculty. Large, organized contingents of “crewed up”  
8 non-students arrived later in the encampment’s life in anticipation of  
9 violence, and many members of the encampment wore Keffiyehs, goggles,  
10 helmets, and gloves. The encampment also boasted substantial stores of  
11 supplies and an enormous “gear depot.” Again, SJP, People’s City Council,  
12 UC Divest, and FJP turned to a coordinated social media campaign that  
13 was clearly part of a broader national strategy derived from the “Popular  
14 University for Gaza” playbook.

15 108. SJP (along with Doe) and UC Divest worked together to launch  
16 the UCLA encampment shortly after SJP’s reveal of the “Popular  
17 University for Gaza.” Organizers planned the encampment and individual  
18 members carried that plan out from start to finish. The common link  
19 between all these entities was Kupsh, who on information and belief  
20 played a significant coordinating and mediating role between the various  
21 groups.

22 109. Immediately after the encampment was constructed, People’s  
23 City Counsel and FJP joined in. Both groups made social media posts,  
24 including collaborations with some of the above Defendants, urging their  
25 followers to join the encampment.

26 110. FJP members offered excused absences to students who joined  
27 the encampment, providing an incentive to participate in conduct that  
28 likely violated university policy. FJP also met with SJP and provided

1 several “faculty advisors” that ended up working on the encampment’s  
2 “security teams.”

3 111. People’s City Council published lists of supplies (including  
4 supplies like goggles and shields likely to be used by the encampment’s  
5 “security teams”) and issued statements purporting to be from the  
6 encampment on its official letterhead and using its official logo. People’s  
7 City Council also had at least three affiliated organizers (Corado,  
8 Sergienko, and Reedy) on the ground for at least part of the encampment.

9 112. WESPAC served as SJP’s fiscal sponsor before, during, and  
10 after it launched the “Popular University for Gaza” initiative of which the  
11 UCLA encampment was part. As discussed above, on information and  
12 belief, WESPAC’s fiscal sponsorship arrangement with SJP (1) established  
13 at least some form of agency relationship during the relevant period and  
14 (2) involved channeling at least some funds to the “Popular University for  
15 Gaza” or the “Campus Support Coalition” that then made their way to one  
16 or more of the other associational Defendants or their constituent  
17 organizations.

18 113. On information and belief, WESPAC would have known about  
19 the UCLA encampment, including its violent and antisemitic nature, by  
20 either surveilling SJP’s national social media accounts or by  
21 communicating with SJP’s national steering committee. Again, Kupsh is  
22 the most obvious throughline.

23 114. Through its campus activism operations, AMP provided  
24 material and operational support to SJP’s national steering committee and  
25 individual SJP chapters before, during, and after SJP launched the  
26 “Popular University for Gaza” initiative of which the UCLA encampment  
27 was part. On information and belief, at least some of that support related  
28

1 to the broader “Popular University for Gaza” and/or the UCLA  
2 encampment in particular.

3 115. SJP, FJP, Doe, UC Divest, and People’s City Council engaged  
4 in a massive recruitment effort to grow the encampment, including a joint  
5 social media campaign, press statements, and participating in media hits.  
6 Once recruits arrived, the same groups equipped and trained “human  
7 phalanxes” and “organized self-defense teams” that were deployed at the  
8 “front lines” of the encampment to threaten counter-protesters and  
9 unfriendly press; deny access (often violently) to Jewish students, faculty,  
10 and staff; expand and maintain the encampment’s control over nearby  
11 buildings; and engage in a violent clash with law enforcement when police  
12 finally stepped in to restore order. These “front line” troops, often not  
13 affiliated with UCLA at all, were recruited from the associational  
14 Defendants’ social media followings as part of a campaign to “defend” the  
15 “student intifada” against “Zionists” and the police.

16 116. Over time, the encampment’s threats of violence escalated into  
17 actual violence. *See Antisemitism and Anti-Israeli Bias at UCLA* at 53 &  
18 n.105, 57-58 (describing the child of a holocaust survivor who was sprayed  
19 with pepper spray, a Native American Jewish woman who was assaulted  
20 with a stick, and a Jewish student who was knocked unconscious, suffering  
21 a serious head wound); *This is Total Lawlessness and Anarchy*, Fox News  
22 (Apr. 29, 2024), [perma.cc/7M2C-FF6X](https://perma.cc/7M2C-FF6X) (interview with Plaintiff Nir  
23 Hoftman, a Jewish UCLA professor who was tackled and robbed by a  
24 member of the encampment).

25 117. First-hand accounts also reported large, organized groups of  
26 violent nonstudents who would emerge from the encampment to chase out  
27 anyone who waived an Israeli flag or otherwise showed support for Jews  
28 and Israel.

1 118. Together, these measures amounted to a Jew exclusion zone  
2 backed by the concrete threat of physical violence. *E.g.*, Compl. ¶6 (Dkt.1),  
3 *Frankel*, No. 2:24-cv-04702-MCS-PD (C.D. Cal.). To “defend” the zone,  
4 members of the encampment organized into teams of “security” personnel  
5 armed with wooden planks, makeshift shields, pepper spray, tasers, and  
6 even a sword. *See Antisemitism and Anti-Israeli Bias at UCLA* at 58. The  
7 purpose of these teams was to intimidate members of the Jewish  
8 community and deny them access to “occupied” territory using  
9 “checkpoints” and “human phalanxes.” *Id.* at 53, 58.

10 119. Based on these events, this Court found in *Frankel* that  
11 “Jewish students were excluded” from the “portions of the UCLA campus”  
12 controlled by the encampment. 744 F. Supp. 3d at 1020-21. UCLA’s  
13 antisemitism task force and DOJ’s Civil Rights Division have both  
14 concurred in that assessment.

15 120. Despite cynical efforts to propagandize otherwise, the  
16 encampment was clearly never peaceful. The organizer who wrote for  
17 Unity of Fields (and whose account Defendant People’s City Council  
18 endorsed on social media) praised the encampment’s violent resistance of  
19 state and local law enforcement’s efforts to clear the encampment, restore  
20 order, and protect the rights of Jewish students as “the Battle of UCLA.”  
21 *Advancing the Line* at 3.

22 121. In a social media thread on the anniversary of law  
23 enforcement’s clearing of the encampment, People’s City Council  
24 remarked that the “militant resistance of the camp [was] rarely uplifted  
25 because it contradicts the image of non-threatening peaceful protesters”  
26 and applauded the “activat[ion]” of “community self defense ... on campus  
27 and across the city” for the purpose of fighting the police.  
28

1           122. Later in the same thread, People’s City Council quoted a  
2 portion of the article citing an organizer’s “joy mixed with hate” as the  
3 encampment’s front line “reappropriate[d] barricades as shields to form a  
4 quasi-barricade enclosing the pigs” while “[s]upporters outside the  
5 encampment” cut off law enforcement from the engagement. People’s City  
6 Council’s contemporaneous response to this development on May 1, 2024  
7 was to tweet “KETTLE THE COPS CHALLENGE—LAPD F\*\*CK OFF.”  
8 Its retrospective a year later was to celebrate the encampment’s  
9 “kettl[ing]” of law enforcement officers and to state that the “most  
10 beautiful moments of a protest is [sic] when the cops are scared and/or on  
11 the run.”

1 123. Even after UCLA finally cleared the encampment, SJP, Doe,  
2 UC Divest, People's City Council, and FJP continued the campaign of  
3 harassment and exclusion that began on April 25, attempting to establish  
4 new encampments, targeting buildings named after prominent Jews, and  
5 blocking access to graduate school facilities.

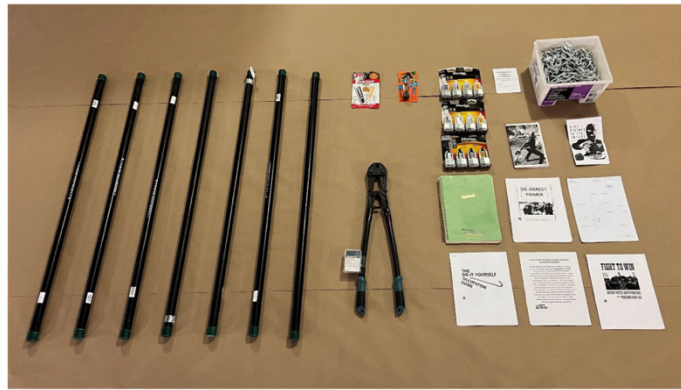


***Images from the Battle of UCLA***

22 124. On May 6, 2024, more than 40 people (including several who  
23 had been arrested at the initial encampment) were taken into custody  
24 after UCLA police discovered them massing in a garage with metal pipes,  
25 bolt cutters, chains and padlocks, and a "Do-It-Yourself Occupation  
26 Guide." *Statement Regarding the Incidents on May 6, 2024.*



Photos



Metal pipes (left), epoxy adhesive and super glue (top center), padlocks (top center), bolt cutters (bottom center), heavy duty chains (top right), documentation encouraging violence and vandalism (bottom right)

125. Police later determined that the group was planning to “occupy” and vandalize Moore Hall, which Defendant Students for Justice in Palestine (echoing its tactics at the encampment the previous week) had urged its supporters to “mobilize” to that morning:



126. A month later, the same groups tried again when around 100 people “marched to the walkway at the top of the Janss Steps and set up an unauthorized and unlawful encampment with tents, canopies, wooden shields, and water-filled barriers.” *Statement Regarding the Unlawful Encampments and Subsequent Arrests on Monday, June 10, 2024*. Just like at the original encampment, this group “restricted access to the general

1 public in violation of University policy” and “disrupted nearby final  
2 exams.” *Id.*

3 127. After police dispersed the new encampment at the steps, the  
4 group marched first to Kerckhoff Patio and then to the courtyard between  
5 Dodd Hall and the UCLA law school. At each location, they “set up another  
6 unauthorized and unlawful encampment” that improperly restricted  
7 access to the public and disrupted nearby final exams. *Id.* Later that day,  
8 members of the group assaulted and threatened to kill Plaintiff Dovid  
9 Gurevich for the offense of being onsite to support Jewish students and  
10 asking why one the encampment-members needed to conceal his face. *See*  
11 Bandler, *UCLA Chabad Rabbi Assaulted by Pro-Palestinian Protesters*.

12 128. On February 12, 2025, SJP’s UCLA chapter was suspended  
13 after a university investigation concluded that the organization had been  
14 involved in a similarly threatening campaign at the home of UC Regent  
15 Jay Sures. Echoing their tactics at the encampment once again,  
16 individuals affiliated with SJP “surrounded the vehicle of a Sures family  
17 member and prevented that family member’s free movement.”

18 129. Later, UCLA officials recommended revoking campus  
19 organization status for SJP’s undergraduate subcomponent indefinitely  
20 and imposing serious sanctions on its graduate-student subcomponent.

21 130. In sum, the associational Defendants and Doe engaged in a  
22 long-running antisemitic conspiracy to deny Jews equal access to UCLA’s  
23 campus. And for roughly a week in Spring 2024, they succeeded in doing  
24 so by enforcing a Jew exclusion zone centered on an encampment  
25 “occupying” the area around Royce Quad. After UCLA belatedly cleared  
26 the encampment, the associational Defendants and Doe conspired to  
27 reestablish it and unabashedly renewed their efforts to ensure that  
28 UCLA’s campus would be unsafe for Jews. By denying Jews equal access

1 to public spaces on campus, subjecting them to racialized violence, and  
2 taking steps to hinder law enforcement's efforts to protect Jews on campus,  
3 Defendants violated federal law.

4 **E. Plaintiffs' Injuries.**

5 131. Plaintiffs have suffered legal injuries because of these actions.  
6 Generally, each Plaintiff was deprived of one or more of their rights or  
7 privileges as a citizen of the United States, including the right to equal  
8 protection of the laws and equal privileges thereunder, including the right  
9 to use and enjoy Royce Quad, Dickson Plaza, Powell Library, Royce Hall,  
10 and Kaplan Hall (places of public accommodation open to the UCLA  
11 community) without fear of race-based violence of area denial.

12 132. **Hoftman:** On April 29, 2024, Hoftman was assaulted by  
13 several members of the encampment's "security team" for the offense of  
14 being a Jew walking in an "occupied" area. As Hoftman conducted an  
15 interview while walking towards the encampment, two or three  
16 individuals affiliated with the encampment moved to block his path.  
17 Though he initially tried to ignore them, one individual stood directly in  
18 front of Hoftman and told him that he could not keep walking in that  
19 direction. When Hoftman attempted to walk around, he was tackled,  
20 causing one of his earbuds to fly out of his ear. Dazed, Hoftman returned  
21 to his feet and briefly searched for the earbud. When he couldn't locate it  
22 quickly, Hoftman left the area to try to report the assault to police,  
23 thinking that it must have been lost in nearby foliage.

24 133. Later that day, after Hoftman had called 911 and reported the  
25 incident to UCLA police, he used an app on his phone to track the lost  
26 earbud. Based on the tracking information, Hoftman determined that the  
27 earbud was moving around inside the encampment and that, rather than  
28 having been lost, it had been stolen by one of his attackers.

1       134. The attack left Hoftman deeply disturbed and afraid to go  
2 anywhere near the encampment. He was saddened to learn that, to  
3 members of the encampment, giving an interview that made clear he was  
4 Jewish and supported Israel was sufficient grounds to deny him access to  
5 an “occupied” public space. And he was shocked that the encampment’s  
6 “security” personnel were ready and willing to use violence to deny Jews  
7 like himself access to the encampment and the public spaces surrounding  
8 it.

9       135. After the attack, Hoftman stayed away from the encampment  
10 until long after police finally cleared it on May 2. Although he would have  
11 preferred to continue to show up in support UCLA’s Jewish community,  
12 Hoftman’s experience with the encampment’s “security teams” proved that  
13 Jews were unwelcome and unsafe in areas that Defendants “occupied” and  
14 that these “security” personnel were willing to range far afield from the  
15 core of the encampment to deny access to and attack perceived enemies.  
16 The prospect of a replay of the assault, or worse, created an unacceptable  
17 risk to Hoftman’s safety.

18       136. In short, Hoftman was injured, both physically and materially,  
19 because he sought to exercise his right as a member of the university’s  
20 Jewish community to visit a public space on campus. And he was excluded,  
21 on threat of violence, from a public space on campus that he would  
22 otherwise have visited. Hoftman was shocked, appalled, and frustrated  
23 that all this happened simply because he is Jewish.

24       137. **Weinberg:** Between April 25 and May 2, the encampment  
25 severely curtailed Weinberg’s ability to access the “occupied” territory near  
26 Royce Quad because of his status as a Jew. Weinberg knew from press  
27 coverage and conversations with friends that members of the encampment  
28 were willing to use violence to enforce their control over the area. And he

1 knew that, because he is Jewish and supports Israel, members of the  
2 encampment would consider him an enemy and prevent him from passing  
3 through any space (public or otherwise) that they controlled on pain of  
4 physical force.

5 138. Based on this knowledge, Weinberg feared that appearing at or  
6 traveling through the part of campus over which Defendants had conspired  
7 to exercise control would threaten his physical safety. That reaction was  
8 natural and correct: The encampment was a fortified camp at the center of  
9 a vortex of radical antisemitism (including “occupied” “intifada hall,”  
10 antisemitic graffiti, and chants of eliminationist slogans like “kill all the  
11 Jews” and “From the River to the Sea”). And it was “defended” by a large  
12 group of “security” personnel that had shown no qualms about using  
13 violence against those they perceived as enemies (i.e., Jews and law  
14 enforcement).

15 139. Weinberg feared that if he tried to go to any of the UCLA  
16 facilities near the encampment (including Powell Library, which students  
17 often use to study) members of the encampment would physically deny him  
18 entry. And he rightly feared that they would threaten him with violence  
19 for even attempting to enter. If those threats did not dissuade him,  
20 Weinberg knew that members of the encampment were willing to engage  
21 in violence towards Jews, including Jewish students, who came nearby or  
22 attempted to bypass their “checkpoints” and “human phalanxes.” Based on  
23 the reasonable fear that the same thing would happen to him, Weinberg  
24 stayed away from the entire area while the encampment was “occupying”  
25 it.

26 140. Weinberg was also forced to take a different route around Royce  
27 Quad on his way to other parts of campus. Prior to the establishment of  
28 the encampment, Weinberg often would walk through the Quad. But after



1 the Defendants worked together to erect the encampment in the middle of  
2 the Quad, Weinberg felt obliged to avoid that area out of concern for his  
3 safety. And he in fact specifically avoided the “occupied” parts of Royce  
4 Quad for the duration of the encampment. In other words, Weinberg was  
5 denied access to the Quad because he is Jewish.

6 141. Weinberg was shocked, appalled, and frustrated that he was  
7 excluded from a public space at his own university simply because he is  
8 Jewish. No institution of higher learning (or any other institution) would  
9 tolerate such blatant racial exclusion targeted at any other group. And it  
10 would ordinarily be clear to all that perpetrating such exclusion denies  
11 members of the targeted group their civil rights. Weinberg is frustrated  
12 that Defendants’ conspiracy rendered Jewish students at UCLA second-  
13 class citizens—forced to avoid pockets of “occupied” territory and to always  
14 be on the lookout for the next encampment, the next checkpoint, or the  
15 next chant of “beat that f\*\*cking Jew!”

16 142. **Gurevitch:** When the same radical core of organizers  
17 attempted to reestablish an encampment near the UCLA law school on  
18 June 10, Rabbi Gurevich came out to support Jewish students and make a  
19 record of what was happening. Members of this new encampment greeted  
20 Rabbi Gurevich with threats of violence and assault. *See Bandler, UCLA*  
21 *Chabad Rabbi Assaulted by Pro-Palestinian Protesters*. A member of the  
22 new encampment’s “security team” slapped Rabbi Gurevich’s phone out of  
23 his hand. *Id.* Rabbi Gurevich’s screen protector was damaged, and if not  
24 for the protector, his phone would have been damaged too. Soon after, the  
25 situation escalated to death threats when a member of the group told  
26 Rabbi Gurevich that he would beat him unconscious and another  
27 explained that, if the individual showed the Rabbi his face, he would “have  
28 to f\*\*cking kill you.” These actions were plainly intended to intimidate



1 Rabbi Gurevich and to prevent him, by force and threat of force, from  
2 exercising his right to be present in a public space on campus as a member  
3 of UCLA's Jewish community without threat of racialized violence.

4 143. Rabbi Gurevich was shocked, appalled, and frustrated that he  
5 had been threatened with violence and attacked simply because he is a  
6 Jew who exercised his right to express support for UCLA's Jewish students  
7 and to appear in public at a public space.

8 144. **Tsives:** Tsives attended every day of the initial UCLA  
9 encampment, during which time he observed the encampment  
10 substantially expand in size and sophistication. For example, as early as  
11 Sunday, April 28, Tsives noticed that members of the encampment had  
12 erected large wooden barricades around the perimeter. And as organizers  
13 pushed out the encampment's borders day-by-day, Tsives observed  
14 members of the encampment's "security teams" becoming more and more  
15 aggressive in their efforts to deny Jews access to the area. Tsives also  
16 observed that the encampment had a well-organized supply system  
17 supported by outside actors, who would drop off supplies at designated  
18 points for members of the encampment to collect and distribute.

19 145. Each day at the encampment, Tsives dressed in a manner that  
20 made clear that he was Jewish, including wearing a visible Star of David  
21 necklace. Thus, whenever Tsives attempted to pass through one of the  
22 "checkpoints" surrounding the encampment, he was either physically  
23 blocked by uniformed members of the encampment's "security teams" at  
24 point of entry or surrounded and forced out of the area by a "human  
25 phalanx" shortly after. For example, on Monday, April 29, Tsives  
26 attempted to pass through the checkpoints and was denied entry after the  
27 "security team" saw his Star of David necklace.

1           146. By the final few days of the encampment, Tsives was forced to  
2 take a different, slower route to his regular class in Kaplan Hall because  
3 the encampment and its enforcers had expanded the perimeter to “occupy”  
4 the entrance he ordinarily used to enter the building. This caused Tsives  
5 to be late to class several times before the encampment was cleared. Tsives  
6 was shocked, appalled, and frustrated that he had been excluded from  
7 public spaces at his own university (including Dickson Plaza/Royce Quad  
8 and his usual route to class) simply because he is Jewish.

9           147. In short, Plaintiffs have all been harmed because of the  
10 conspiracy. Hoftman was assaulted and robbed by members of the  
11 encampment’s “security” team. Rabbi Gurevich was assaulted and  
12 subjected to death threats in June when the same core of radicals  
13 attempted to reestablish an encampment near the UCLA law school.  
14 Weinberg was denied access to the “occupied” parts of Royce Quad and  
15 forced to change his ordinary routine in April and May out of concern for  
16 his safety. And Tsives was physically denied access to his ordinary route  
17 to class in Kaplan Hall because the encampment had “occupied” the  
18 entrance he ordinarily used, causing him to be late to class. Each knew  
19 that Jews were not welcome around the encampment (and subsequent  
20 attempted encampments), and that this lack of fellow feeling would  
21 inevitably result in violence were they to assert their right to exist as Jews  
22 in “occupied” territory.

23           148. As a direct and proximate result of the encampment and  
24 subsequent attempts to reestablish it, Plaintiffs have suffered harm in the  
25 form of both general and special damages in an amount to be determined  
26 at trial, including, but not limited to, compensatory damages, punitive  
27 damages, and pre-judgment and post-judgment interest.

**CLAIMS FOR RELIEF**

**Count I**

**42 U.S.C. §1985(3)**

**Civil Rights Conspiracy**

**Deprivation Clause & Hindrance Clause**

**(Against National Students for Justice in Palestine, John Doe #1,  
President of UCLA SJP, AJP Educational Foundation, Inc., d/b/a  
American Muslims for Palestine, Faculty for Justice in Palestine  
Network, UC Divest Coalition, WESPAC Foundation, and  
People's City Council)**

149. Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

**A. Section 1985(3)'s deprivation and hindrance clauses.**

150. Section 1985 of the Ku Klux Klan Act prohibits conspiracies “for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws.” 42 U.S.C. §1985(3).

151. If a member of a prohibited conspiracy “do[es], or cause[s] to be done, any act in furtherance of the object of such conspiracy” whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.” *Id.*

152. Though this language is sometimes referred to collectively, it is made up of two separate clauses—a “deprivation clause” and a “hindrance

1 clause.” *Nat’l Abortions Fed’n v. Operation Rescue*, 8 F.3d 680, 682 (9th  
2 Cir. 1993). “There is a significant distinction between the clauses.” *Id.* at  
3 685. “The deprivation clause concerns conspiracies of some private persons  
4 to commit tortious actions against other private persons.” *Id.* “The  
5 hindrance clause, on the other hand, concerns conspiracies to thwart state  
6 law enforcement from protecting against such tortious activity.” *Id.*

7 153. Plaintiffs can pursue deprivation clause claims against private  
8 conspirators if the conspiracy was animated by “racial, or perhaps  
9 otherwise class-based, invidiously discriminatory animus” and “aimed at  
10 interfering with rights that are protected against private, as well as  
11 official, encroachment.” *Bray v. Alexandria Women’s Health Clinic*, 506  
12 U.S. 263, 268 (1993) (cleaned up). Two such rights are the right to be free  
13 from racial violence and the right to be free from racially motivated  
14 deprivation of the use of public amenities. *See, e.g., Griffin v. Breckenridge*,  
15 403 U.S. 88, 105 (1971); *Sines v. Kessler*, 324 F. Supp. 3d 765, 782 (E.D.  
16 Va. 2018); *Sealed Plaintiff 1 v. Front*, 2024 WL1395477, at \*19, \*23-\*25  
17 (E.D. Va. Mar. 31).

18 154. Plaintiffs can pursue hindrance clause claims against private  
19 conspirators if the purpose of the conspiracy was to “interfere with state  
20 law enforcement” and that hindrance was “directed at a protected class  
21 exercising a constitutional right.” *Operation Rescue*, 8 F.3d at 685. But  
22 because “a conspiracy with the purpose of curtailing state activity  
23 necessarily implicates the state,” *Lesley v. Bennett*, 778 F. Supp. 3d 1201,  
24 1220 (D. Wyo. 2025), and “[t]he hindrance clause ... implicates the ability  
25 of the State to ensure and safeguard rights protected against any  
26 infringement, ... claims brought under the hindrance clause ... do not  
27 require that the right allegedly infringed be one guaranteed against  
28

1 private encroachment,” *id.* (quoting *Libertad v. Welch*, 53 F.3d 428, 450  
2 (1st Cir. 1995)); *see also Operation Rescue*, 8 F.3d at 685-86.

3 155. The private conspiracy behind the April 2024 campus  
4 encampment at UCLA implicates §1985(3) liability under both clauses.

5 **B. The conspiracy is actionable under the deprivation clause.**

6 156. Under the deprivation clause, the conspiracy (i.e., the UCLA  
7 encampment and subsequent efforts to reestablish it as part of the  
8 “Popular University for Gaza”) was driven by racial and ethnic animus  
9 against Jews, who are a protected class under the civil rights laws, and  
10 was aimed at interfering with Plaintiffs’ rights, as members of the Jewish  
11 community, to safely traverse campus and take advantage of UCLA’s  
12 public facilities free from race-based violence and area denial. By  
13 “occupying” the area around Royce Quad, including multiple university  
14 buildings, for an extended period, the encampment *created and expanded*  
15 *a race-based Jew exclusion zone on an American university campus*.  
16 Members of the encampment enforced this antisemitic blockade with  
17 barricades, checkpoints, armed security teams, and human phalanxes. In  
18 practice, those organizing and executing these tactics relied on race-based  
19 threats, and if that did not suffice, plain old race-based violence, to ensure  
20 that they maintained control.

21 157. That the encampment ran on racialized threats and violence  
22 was no accident. Although some members may have tried to publicly frame  
23 the encampment as peaceful or tolerant as part of a cynical propaganda  
24 strategy for dealing with the media, the encampment’s militant organizers  
25 knew from the beginning that they were there for a “battle.” And the group  
26 (along with the police) that organizers and front-liners alike were most  
27 eager to fight were “Zionists,” a racist dog whistle. The Unity of Fields  
28 article, for example, refers to “Zionists” “scatter[ing] like cockroaches” in

1 the face of a line of encampment members “suddenly approaching them”  
2 with “wood pallets and metal barricades” in hand. *Advancing the Line* at  
3 6.

4 158. In sum, the encampment’s antisemitic animus and its clear  
5 goal of creating, expanding, and enforcing a Jew exclusion zone using  
6 racialized violence and area-denial tactics place it squarely within the  
7 scope of conspiracies actionable under §1985(3)’s deprivation clause.

8 **C. The conspiracy is actionable under the hindrance clause.**

9 159. The UCLA encampment's violent and antisemitic aims also  
10 implicate the hindrance clause. The encampment was virulently  
11 antisemitic, committed to the creation, maintenance, and enforcement of  
12 a Jew exclusion zone, and made use of tactics that denied many members  
13 of the Jewish community, including Plaintiffs, rights, privileges, and  
14 immunities guaranteed to them by the Constitution. The hindrance clause  
15 simply considers that, in addition to the goal of denying Jews their  
16 constitutional rights, the encampment was also squarely aimed at  
17 “preventing or hindering” law-enforcement from securing those same  
18 rights for Jews.

19 160. As complaints from the Jewish community mounted regarding  
20 the encampment’s flagrant antisemitism, its willingness to use violence,  
21 and its implementation of a racialized Jew exclusion zone, UCLA officials  
22 belatedly began to take a harder line. This more severe response was  
23 entirely justified under the law (although, to be clear, UCLA could have  
24 and should have acted much sooner, as the encampment was in violation  
25 of several laws and university policies since it was constructed on the  
26 morning of April 25, *e.g.*, *Antisemitism and Anti-Israeli Bias at UCLA* at  
27 51-52). After university officials finally declared the encampment illegal  
28 on April 30, a law-enforcement force made up of representatives from



1 multiple state and local agencies issued an unlawful assembly order on  
2 May 1 and eventually cleared the encampment during the early hours of  
3 May 2. In other words, law enforcement’s deployment to the encampment  
4 was intended to restore the rule of law and to protect the community  
5 members whose rights the encampment had been trampling since it was  
6 formed almost a week before.

7 161. But regardless of law-enforcement’s manifest justification for  
8 acting, the encampment did not go quietly. Indeed, one of its organizers  
9 (whose account of events was repeatedly endorsed by Defendant People’s  
10 City Council in an encampment “anniversary” thread) has since explained  
11 that manufacturing an opportunity for a “battle” with police was, aside  
12 from rendering the “occupied” part of campus unsafe and intolerable for  
13 Jews, one of the encampment’s main objectives.

14 162. After stockpiling supplies and heavily recruiting on April 30  
15 and May 1, the encampment was fully focused on this confrontation, which  
16 eventually materialized on the evening of May 1, 2025, and the morning  
17 of May 2 when law enforcement deployed to clear the encampment and  
18 restore safety and security to campus for UCLA’s Jewish community.  
19 Members of the encampment engaged in an hours-long “battle” with law  
20 enforcement, including at least one instance where they “kettled” and  
21 drove back a contingent of officers with barricades, shields, and hand  
22 weapons.

23 163. This kind of organized violence—directed against police for the  
24 express purpose of preventing law enforcement from clearing the  
25 “occupied” area and thus restoring Jews’ rights to move about campus  
26 freely absent the threat of racial violence and area-denial—is exactly the  
27 kind of hindrance conspiracy §1985(3) was written to prohibit.  
28

**Count II**  
**42 U.S.C. §1986**  
**Failure to Prevent Civil Rights Conspiracy**  
**(Against Defendants Doe #1, Abuirshaid, and Bazian)**

164. Plaintiffs incorporate by reference the allegations set forth in the preceding paragraphs.

**A. Section 1986’s neglect or refusal clause.**

165. Section 1986 of the Ku Klux Klan Act provides that “[e]very person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 ... , are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured, or his legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented.” 42 U.S.C. §1986.

166. Under §1986 an individual is not required to have “participated in the conspiracy or shared in the discriminatory animus with members of the conspiracy.” *Park v. City of Atlanta*, 120 F.3d 1157, 1160 (11th Cir. 1997). Rather, for liability to attach it is enough that the individual “knew of a §1985 conspiracy and, having the power to prevent or aid in preventing the implementation of the conspiracy, neglected to do so.” *Id.*

**B. The §1986 defendants knew of the §1985(3) conspiracy animating the UCLA encampment.**

167. On information and belief, the §1986 Defendants knew about the encampment and the antisemitic conspiracy animating it because they were high-ranking officials in organizations that were parties to that conspiracy.

1 168. On information and belief, Doe #1 was the leader of SJP's  
2 UCLA chapter, which publicly took credit for the encampment, played a  
3 key role in constructing the encampment on April 25, and subsequently  
4 had significant organizational and operational responsibilities as the  
5 encampment expanded. Common sense indicates that Doe knew of the  
6 conspiracy in which he was a major player.

7 169. Abuirshaid and Bazian were AMP's Executive Director and  
8 Chairman, respectively. On information and belief, both would have  
9 regularly communicated with and received reports from Taher Herzallah,  
10 AMP's Associate Director of Outreach & Community Organizing.  
11 Herzallah's role entails acting as a liaison to campus activism groups on  
12 campuses across the country, including SJP chapters, helping student  
13 groups procure grants, materials and speakers and to set up programs and  
14 activities, and coordinating AMP's grassroots organizing to facilitate  
15 national coalition building. On information and belief, Herzallah would  
16 have been responsible for coordinating AMP's support of SJP and its  
17 initiative to build a nationwide coalition of "Popular University for Gaza"  
18 encampments on college campuses, including securing support for UCLA's  
19 chapter of SJP and the UCLA encampment.

20 170. On information and belief, given their knowledge and high-  
21 ranking positions, the §1986 Defendants had the power to at least aid in  
22 preventing the conspiracy.

23 171. On information and belief, Abuirshaid and Bazian could have  
24 instructed Herzallah to cease using AMP resources to support SJP, its  
25 national push for antisemitic campus encampments as part of the "Popular  
26 University for Gaza," and the UCLA campus encampment specifically.  
27 Abuirshaid and Bazian could also have caused Herzallah/AMP to condition  
28 any continued support for those organizations and programs on disavowal

1 of the racialized violence and area-denial tactics that made the UCLA  
2 encampment so harmful to the Jewish community.

3 172. Doe #1 could have simply refused to participate in launching  
4 the encampment and used his authority within UCLA's SJP chapter to  
5 cause the chapter to follow suit. Once the encampment started, Doe could  
6 have refused to support the violent and race-based tactics that became the  
7 encampment's calling card. And if it became clear that the encampment  
8 was both outside of his control and engaged in systematic race-based  
9 violence, Doe could have told UCLA officials and law enforcement what  
10 was happening and encouraged them to act.

11 173. Rather than take any of these steps to prevent or aid in  
12 preventing the conspiracy, on information and belief, the §1986  
13 Defendants neglected their duty or simply refused to act. That they did so  
14 is no surprise. After all, the AMP §1986 Defendants have been denigrating  
15 Israel and promoting Jew-hatred in the United States for decades. And  
16 Doe oversaw perhaps the single most radical SJP chapter in the country.  
17 But the fact that a conspiracy against civil rights can be resilient does not  
18 make it legal.

19 174. These failures to act harmed Plaintiffs by enabling the  
20 encampment to function at its fullest, most violent potential, which is the  
21 direct and proximate cause of Plaintiffs' physical and emotional injuries.  
22  
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**PRAYER FOR RELIEF**

Wherefore, Plaintiffs respectfully request that the Court grant:

- A. A declaratory judgment that the actions described herein violate  
deprived Plaintiffs of their rights under the federal law.
- B. Compensatory and punitive damages in an amount to be  
determined at trial.
- C. Interest, attorneys' fees, and costs, as allowed by law.
- D. Such other relief as the Court deems necessary and just.

DATED: September 26, 2025

/s/ Thomas R. McCarthy  
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**JURY DEMAND**

Plaintiffs request a trial by jury on all issues so triable.

DATED: September 26, 2025

/s/ Thomas R. McCarthy

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